

City of Covington Organization Reviews

June 2012

Management
Partners





June 29, 2012

The Honorable Chuck Scheper
Mayor
City of Covington
638 Madison Avenue
Covington, KY 41011

Dear Mayor Scheper:

Management Partners is pleased to transmit our final report on the outcomes of the organization reviews of Covington's Police, Fire, Community Development and Code Enforcement departments. This report also includes recommendations pertaining to restructuring of Covington's macro administrative organization. The Department of Public Improvements, which was created in 2008 as a result of an organizational review by Management Partners, received a follow-up scan to determine if any outcomes of the current reviews would impact that department. Because of the need to focus on budget preparation, the review of the Finance Department could not proceed in conjunction with the others. The review of the Finance Department is currently underway and the results of that analysis will be presented in a separate report.

Our objective in this engagement was to determine if there are ways to reduce operations costs while maintaining or improving service quality. If all 57 recommendations in the report were to be implemented, there is a potential to reduce costs in excess of \$3.2 million without impacting service quality.

Implementation of many of the recommendations will require entering into agreements with other area jurisdictions and service providers for service sharing and mutual aid. Consequently, implementation actions will be characterized by outreach to other agencies, determined leadership to seek multi-jurisdiction solutions to achieve sustainable service quality levels as well as leadership to implement those actions that Covington can undertake unilaterally.

The economies that can be achieved by implementing the recommendations in this report would move Covington very close to a sustainable financial position and position the City for success in achieving the elements of the Ten Point Plan that has guided its efforts since the autumn of 2011.

Management Partners project team will be available to meet with members of the Covington City Commission and City staff to address any questions arising from this report.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerald E. Newfarmer", written in a cursive style.

Gerald E. Newfarmer
President and CEO



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Executive Summary

Management Partners was engaged in January 2012 by the City Commission to perform organization reviews of several Covington departments. We reviewed the operations of the Police Department, Fire Department, Community Development, and Code Enforcement departments, and the organization of the Office of the City Manager, the results of which are reported in this document. A review of the Finance Department and the City's financial management is in progress and will be reported separately.

This report sets forth 57 recommendations that have the potential to reduce Covington's annual general fund by a range of \$3.2 million to \$4.2 million without reducing current service quality. It also makes a number of recommendations that would result in a significant improvement in service quality with no increase in cost.

Patrol operations will be enhanced by a number of initiatives recommended in this report. Through implementation of a telephone reporting system for low priority 911 calls an estimated 3,000 hours of officer time would be freed up to focus on directed patrol and officer initiated activities. A tactical unit in patrol would be created from current special units to provide a more nimble and agile force to respond to crime patterns and trends on a timely basis. Rebalancing of shift staffing will provide a better match of availability to demand. These steps will result in a significant improvement in effective street strength.

The transfer of E-911 Center operations from Covington to Kenton County will provide better coordination of emergency response throughout the county as well as for Covington. The transfer will also make Covington's new records management system available to all emergency service jurisdictions served by the County's E-911 Center, resulting in timely and effective crime analysis. It will also save Covington in excess of \$1 million a year.

A reorganization of the Police command staff as recommended would provide better unity of command, reduce overhead from 11% to 7%, save

in excess of \$400,000 a year and remove one tier of management between the chief and officers on the street.

Implementing the Police Department recommendations in this report would make Covington a state of the art department and improve crime control while reducing cost in excess of \$1.4 million.

The Covington Fire Department's operations and deployment plan is not financially sustainable at current tax rates. The objective of our analysis was to identify the operations/deployment alternatives that would be financially sustainable while maintaining current service levels. Currently, the department meets American Heart Association standards for emergency medical service (EMS).

The report identifies two alternative plans for maintaining that service standard at a cost savings of \$500,000 to \$1,500,000 below the current cost. One option is to privatize the service by selecting a private vendor and use a performance contract based on current response standards. The second option would be to change the organizational placement of the service within the Covington government structure in an agency other than the Fire Department. That would reduce the pension cost for assigned personnel while also allowing a more efficient alignment of staffing to demand patterns.

Currently, the Fire Department meets National Fire Protection Association standards and Occupational Safety and Health Administration standards for response for initial attack for fire suppression. Sustained operations and simultaneous incidents currently rely on mutual aid from other surrounding jurisdictions, a practice that is uniform with all fire departments in Kenton County.

One option for fire suppression operations modification was identified if needed to attain financial sustainability. The Fire Department currently has two aerial trucks. One of those trucks could be placed into reserve status and not staffed on a daily basis. That would allow daily staffing to be reduced by two personnel and would save approximately \$800,000 a year.

The analysis of the Fire Department raises the issue of considering the regional implications of fire and EMS. Growth and resettlement throughout the region and changing life styles that are not compatible with volunteer operations will increase the demand for full-time professional fire and EMS personnel. Millions of dollars in cost avoidance for new facilities, equipment and personnel would be realized by right-sizing these services on a regional basis. The report strongly

recommends that Covington assume a leadership role in discussing this concept so that a viable plan for regional service can be developed.

The recommendations for the Fire Department have the potential for reducing the City's annual operating budget between \$1.3 million and \$2.3 million while maintaining the current level of service.

The Ten Point Plan for Sustainability correctly realizes that while cost containment is a crucial element, growth is perhaps even more important. Covington has initiated the momentum for growth through the PUMA Center City Development Plan that focuses on the commercial district of the City. To accompany the plan for jumpstarting commercial growth, we recommend development of a housing strategy to enhance long-term residential development and to maintain and upgrade the current residential stock through aggressive code enforcement and new programs focused on rental, ownership and vacant structures.

Recognizing that the City does not have either the money or personnel resources to be the lead development agency, Management Partners recommends support for the Urban Partnership incorporated in the PUMA plan. That partnership would bring together the relevant stakeholders who must be participants for growth to get underway. We recommend that the City use its federal entitlement funds to support Urban Partnership operations and development initiatives even though that means discontinuing its own programs. Covington's loan and financing programs cannot be robust enough on their own to make a difference in the development environment. Covington's resources must be used as gap fillers and leverage for private sector projects more maximum impact.

Code enforcement was cited to the Mayor in his discussions with 17 of 19 neighborhood groups as the most important priority for City government attention. This report provides recommendations for an aggressive code enforcement operation that will preserve the built environment while preserving property values throughout Covington.

Code Enforcement, Housing and Community Development, currently three separate agencies, are recommended to be merged into a single agency under an Assistant City Manager for Development. This will unify and focus the City's role in the partnership-driven development mission.

Another significant recommendation is to eliminate the current code enforcement operations plan and implement an optional plan for code enforcement. Options identified include outsourcing to a private vendor

or regional agency, insourcing through a part-time employee model as practiced by the City of Newport, or sharing code enforcement services through a newly created consortium of area governments. Any of these options would provide a more robust and aggressive code enforcement effort while potentially saving over \$475,000 annually.

The City Manager currently has 13 direct reports. Management Partners recommends restructuring the overall government organization and reduces the number of City Manager direct reports to seven. The merger of the Code Enforcement, Housing, Community Development agencies and the Parks, Recreation and Neighborhood Services department into a single agency under an Assistant City Manager represents a significant reduction in direct reports while also providing for better coordination in the City's development mission.

Placing the Human Resources Department and the Legal Department under a second Assistant City Manager and adding the public information and purchasing functions to the portfolio will unify administrative support operations as well as reduce the direct reports to the City Manager.

Although no cost savings are anticipated from these recommendations the City Manager's time will be freed to implement and direct a management system set forth in this report. The system will allow senior staff and the City Commission to function in an environment that has strategic plans, performance measures and standards, systematic evaluation of performance and performance reporting protocols. Such a system establishes a profile for what success looks like for City programs so that employees can be clear on expectations and effectively act to achieve goals and objectives.

Background

The City of Covington is facing difficult conditions. Revenues are stagnant and cash reserves are nearly gone. Personnel costs are increasing significantly due to increases in health care coverage and state assessments for employee pension systems.

The City has adopted a ten-point plan designed to place Covington's municipal government on the road to financial sustainability. One of the ten points is to carry out organization reviews of all City departments to assure that they are operating at optimum efficiency and effectiveness. The Mayor has raised funds from private donations to execute the reviews.

Management Partners has been engaged by the City Commission to perform organization reviews of the following Covington departments:

- Police Department
- Fire Department
- Community Development and Code Enforcement Departments
- Finance Department

Our scope of work also entailed reviewing the macro organization structure of the City administration and developing recommendations for improvement.

An additional element of the scope of work was to carry out a scan of the Department of Public Improvements (DPI). The Department of Public Improvements was created in 2008 as a result Management Partners' review of the then Department of Public Works and Department of Parks, Recreation and Neighborhood Services. The purpose of the scan is to synchronize the DPI organization structure with any changes that would result from the current organization reviews.

This report presents recommendations for improvements to the police, fire, community development, code enforcement departments and the macro administrative structure of the City. Finance Department staff members were fully committed to budget preparation work when the

reviews of other departments were undertaken. Consequently, review of the Finance Department has just recently commenced and the results of that work will be presented separately.

Attachment A provides a summary of the recommendations in this report.

Police Department Organization Review

Methodology

Management Partners' project team members have deep experience in managing and providing police services. The team members have reviewed every organizational aspect of police service in dozens of law enforcement agencies across the country.

Management Partners interviewed members of the City Commission, the City Manager, Police Department command staff, department managers and supervisors. We also conducted an on-line survey to which all sworn and civilian members of the department were invited to respond. Employee survey responses were aggregated and analyzed. Focus groups were convened to drill down into subject matter concerns revealed through the employee survey.

We studied organizational reporting relationships for comportment to generally accepted principles of span of control and unity of command. Policies and procedures were compared to industry best practices. We analyzed demand profile data for patterns and trends, and evaluated deployment plans and staffing as they correlated to demand.

Information from the research phase of the study was compiled into preliminary recommendations and presented to Covington officials for discussion. Corrections or clarifications were made to the report to assure accuracy.

Organization Plan

Current Organization Plan

The current organization plan for the Covington Police Department is shown as Figure 1 below. This arrangement accounts for Covington eliminating its E-911 Center.

Figure 1. Covington Police Department Organization Chart 2012

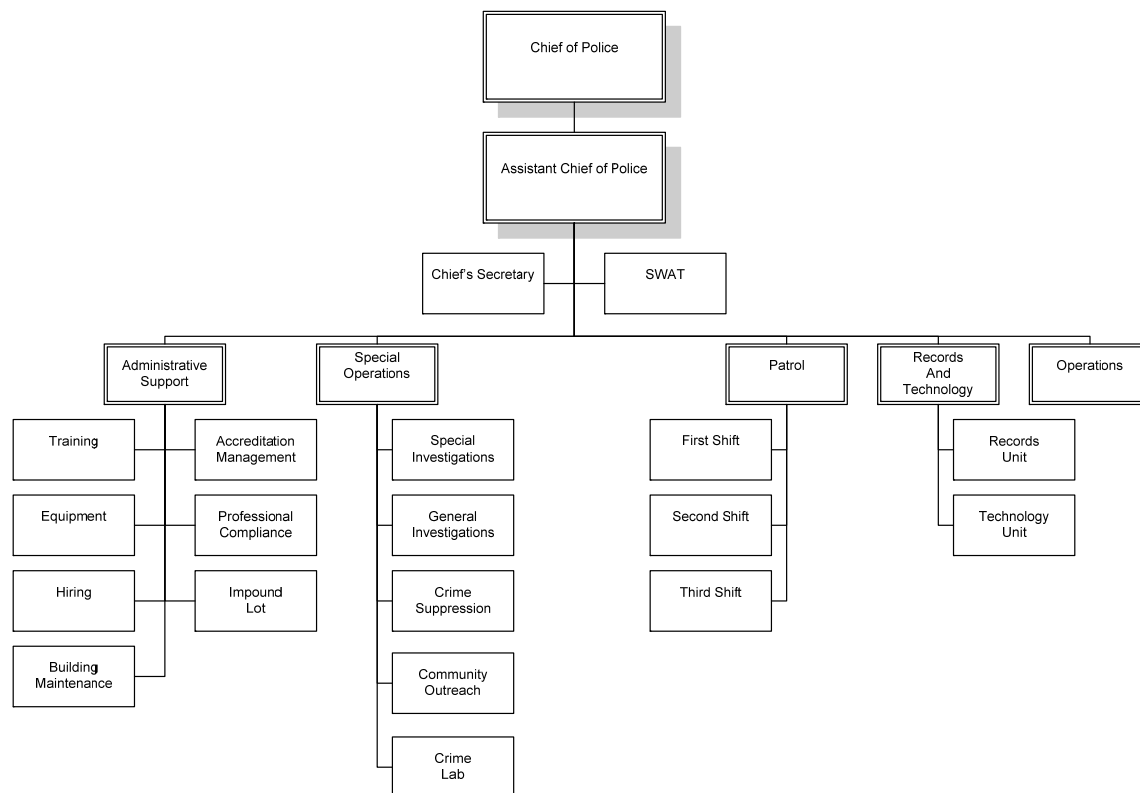


Table 1 shown below displays the allocation of personnel by rank to the department's organizational units. This table accounts for Covington eliminating its E-911 Center.

Table 1. *Covington Police Department Personnel Allocation by Unit and Rank*

Rank	Total Number	Number of Sworn	Number of Civilians
ADMINISTRATION			
Chief of Police	1	1	0
Assistant Chief of Police	1	1	0
Captain	2	2	0
Sergeant	1	1	0
Secretary	1	0	1
PATROL			
Captain	1	1	0
Lieutenant	3	3	0
Sergeant	9	9	0
Officer	61	61	0
Park Ranger	4	0	4
Cadet	1	0	1
SPECIAL OPERATIONS			
Captain	1	1	0
Lieutenant	1	1	0
Sergeant	3	3	0
Specialist	10	10	0
Detective	10	10	0
Crime Scene Technician	3	0	3
RECORDS AND TECHNOLOGY			
Captain	1	1	0
Lieutenant	1	1	0
Sergeant	2	2	0
Records Clerk	3	0	3
TOTAL	120	106	14

Table 2 shows the number of authorized sworn positions by rank.

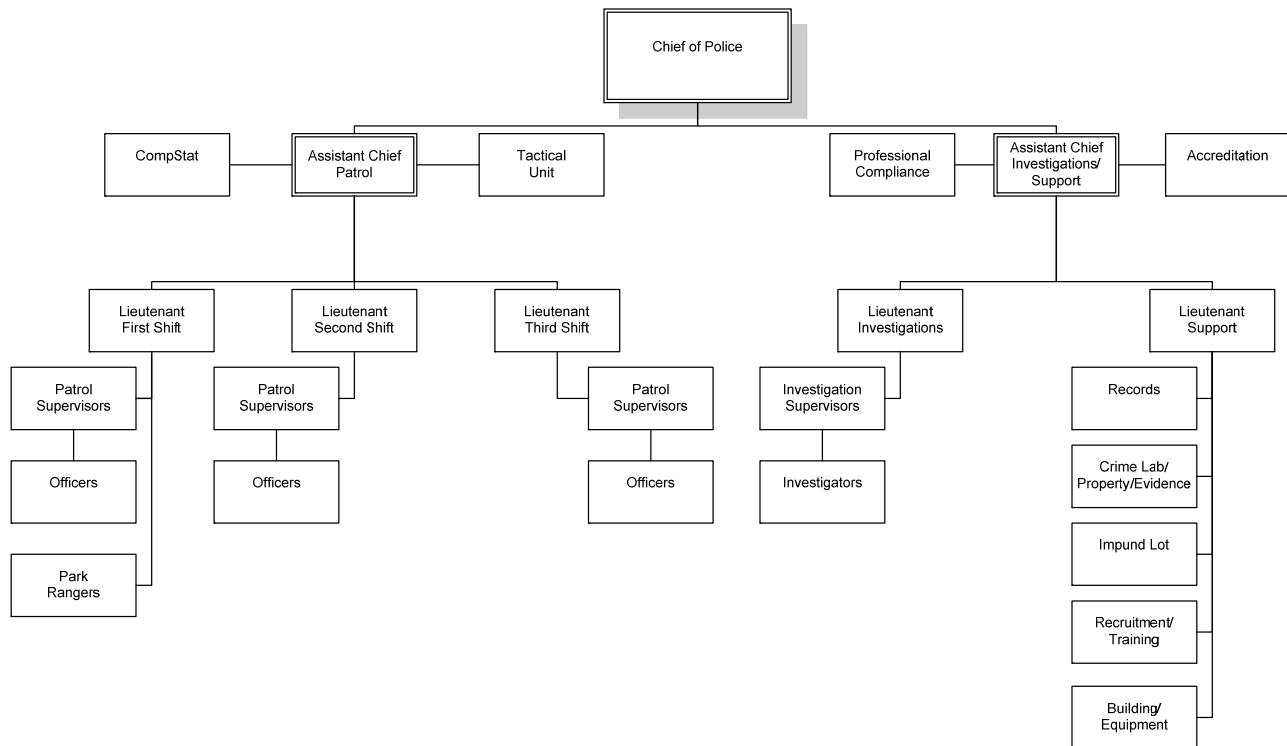
Table 2. *Covington Police Department Sworn Positions by Rank*

Rank	Number Authorized
Chief of Police	1
Assistant Chief of Police	1
Captain	5
Lieutenant	5
Sergeant	15
Specialist	10
Detective	10
Officer	61
Total	108

Recommended Organization Plan

Our analysis of the current organization plan for the department indicates that a more economical structure that will also improve unity of command and span of control, should be implemented. Figure 2 displays the recommended organization plan.

Figure 2. Recommended Organization Plan for the Covington Police Department



Compared with best practices, the current organization structure of the department is command heavy with a chief, assistant chief, five captains and five lieutenants. This equates to 11% of the sworn personnel being in command/management positions. The most economical organization structures would be closer to 7% of positions being in command/management positions. There are also three tiers of command/management between the highest level and first line supervision. In an organization the size of the Covington Police Department, for economical operations there should be no more than two tiers between the police chief and first line supervision (sergeant). The ratio of first-line supervision (sergeants) to officer/specialist/detective is 6.75 to 1, an appropriate ratio.

The essential difference in the proposed organization plan compared to the current plan is that the rank of captain is eliminated and one assistant chief position is added. This plan reduces the number of command/management positions from the current number of 12 to 8 positions and reduces the percentage of positions in command/management from 11% to 7%. It also reduces the number of tiers between the chief and sergeant to two tiers.

The average cost of a police captain is \$111,122 and the average cost of an assistant police chief is \$118,316. The estimated reduction in expense resulting from this organization plan is approximately \$437,000.

Table 3 shows the comparison of the number of command/management positions under the current organization plan to that same number in the recommended plan.

Table 3. *Organization Plan Command/Management Position Number Comparison*

Rank	Current Plan Number	Recommended Plan Number	Difference
Police Chief	1	1	0
Assistant Chief	1	2	+1
Captain	5	0	-5
Lieutenant	5	5	0
TOTAL	12	8	-4

Recommendation 1. Reorganize the command and management structure of the department to eliminate the rank of captain and create an additional assistant chief position.

The City may find it is preferable to achieve this ultimate organization plan through attrition at the captain rank. Three of the five captains are currently eligible for retirement and we understand that one captain has applied for retirement as of August 1, 2012. Implementation by attrition will postpone the ultimate cost reduction but may be preferable to using a series of demotions to achieve the recommended plan.

Patrol and Investigations and Support Bureaus

The recommended organization structure of the department is composed of two bureaus: Patrol Bureau and Investigations and Support Bureau, each under the command of an Assistant Chief.

Patrol Bureau Organization

The Patrol Bureau would be led by an assistant chief and organized into three shifts, each shift under the command of a lieutenant. Shifts would remain as ten-hour overlapping cycles in each 24-hour day. In addition to the three shifts under the command of lieutenants, a fourth group of officers would be assigned to a tactical unit.

This group would be assigned tactically by the assistant chief for patrol in collaboration with the three shift commanders. The range of duties of the members of this unit would cover all patrol activities as well as activities currently assigned to special units. The tactical unit would include the following current special units:

- Power shift
- School Resource Officers
- Housing Authority Officers
- FBI Safe Streets Task Force Officer
- DEA Task Force Officer
- Community Outreach Officers

Later in this report the subject of special units is presented in greater detail.

The Covington special weapons and tactics (SWAT) unit would be under the command of the Patrol Bureau assistant chief.

Investigations and Support Bureau

The Investigations and Support Bureau would be led by an assistant chief and organized into an Investigations Division and a Support Division. Each of these would be commanded by a lieutenant.

The Investigations Division would be responsible for all criminal investigations, as it is currently.

The Support Division would be responsible for the following areas:

- Records
- Crime Lab
- Property and Evidence
- Impound Lot
- Recruitment and Training
- Building and Equipment

This new Police Department organization plan would provide a more economical structure that also better unifies operations into similar and supporting relationships.

More importantly, this organization plan will allow the Covington Police Department to utilize a proven police service management system for effectively responding to crime, the CompStat model.

CompStat Policing Model

Management Partners recommends Covington Police Department implement the CompStat model of managing its operations. The CompStat model is an information-driven, multi-faceted approach to police service which originated in the New York City Police Department in the 1990s. It is characterized by continuous analysis of operational results aimed at realizing targeted outcomes and adjusting tactics and deployment based on success and failure.

Covington has recently begun implementing a new state-of-the-art records management system (RMS). This new RMS has the potential for providing accurate and timely intelligence on crime patterns and trends that would allow the department to respond effectively.

Organizing the Patrol Bureau as recommended in this report by creating a tactical unit that would work closely with each patrol shift, combined with the intelligence potential of the new RMS, would make the Covington Police Department a more agile force in attacking the crime situations in the City.

Other recommendations made later in this report pertaining to differential response to 911 calls for service would provide better customer service and also free patrol bureau personnel to engage in directed patrol and officer-initiated activity. When implemented in conjunction with RMS intelligence production and the reorganization of patrol for effective tactical deployment, these recommendations should represent a significant enhancement to the ability to control crime.

Recommendation 2. Implement the CompStat policing model.

E-911 Center

At the time of our review, Covington had its own E-911 Center, also known as a Public Safety Answering Point (PSAP). As our review was concluding, the Covington City Commission voted to close its own E-911 Center and receive the service from Kenton County. To achieve better coordination of emergency responders in the case of regional emergencies or disasters, PSAPs should be kept to the fewest number needed to serve the region. In this case, the area and population parameters indicate that a single PSAP is a better plan for meeting regional disasters and emergencies than Covington having its own PSAP. As this report was being prepared, the City of Erlanger still has a PSAP that provides service to several public safety agencies in Kenton County.

In addition to achieving better regional emergency responder coordination, having a single E-911 Center in Kenton County will also result in significant cost reductions while maintaining the current service quality level. Covington alone would save in excess of \$1 million.

Covington has recently begun implementing a state-of-the-art computer aided dispatch (CAD) and records management system (RMS) that neither Kenton County nor Erlanger enjoys. This system, if available to all public safety agencies in Kenton County, would facilitate better coordination of emergency response planning on a local and regional basis and allow for a common database regarding any aspect of public safety records management. Such a common database would be a significant tool to aid crime analysis, traffic stops, mutual aid planning such as mutual aid alarm box system (MABAS) and implementation of automatic aid agreements.

While neither Covington nor Kenton County has control over the Erlanger PSAP, if Covington's new CAD/RMS was provided to Kenton County as surplus property when Covington closes its E-911 Center that would be a significant incentive for Erlanger and its serviced public safety agencies to receive their E-911 services from Kenton County. If that were to occur there would be a single PSAP serving all of Kenton

County resulting in a significant cost savings and improved public safety services.

Recommendation 3. Close Covington's E-911 Center and transfer surplus hardware and software to Kenton County.

Recommendation 4. Receive future E-911 service from Kenton County.

Patrol Staffing

Current Staffing Plan

Patrol staff members, except for the commander, work ten-hour shifts on a five-day on three-day off rotation. Compared to an eight-hour shift, the ten-hour shift provides a better match to the demand profile (as measured by dispatched calls for service) because it allows for overlapping deployment of officers over a 24-hour period. In addition to the three overlapping shifts per day, the department also uses a “power shift” that begins midway between the starting times of the second and third shifts.

911 Demand Profile

Table 4 shows the demand profile based on dispatched calls for service by hour of the day. The data were provided by the department and are for the year 2011.

The table also shows the number of hours of patrol time consumed by 911 calls for service. It assumes that the average time consumed per 911 dispatched calls for service is 30 minutes and that completion of reports takes an additional 10 minutes. (Because of priorities for implementing the new RMS, the department was not able to provide data that would allow for a precise determination of average dispatched call for service time.)

Table 4. *Covington Police Department Dispatched Calls for Service (DCS) for 2011*

Hour	Number of Dispatched Calls for Service	Average Number of Dispatched Calls for Service/Hour	Hours 911 Demand	Report Time	Total
Midnight	2,239	6.13	3.07	1.02	4.09
0100	1,888	5.17	2.59	0.86	3.45
0200	1,658	4.54	2.27	0.76	3.03
0300	1,173	3.21	1.61	0.54	2.15
0400	678	1.86	0.93	0.31	1.24
0500	528	1.45	0.73	0.24	0.97
0600	505	1.38	0.69	0.23	0.92
0700	885	2.42	1.21	0.40	1.61
0800	1,243	3.41	1.71	0.57	2.28
0900	1,562	4.28	2.14	0.71	2.81
1000	1,636	4.48	2.24	0.75	2.99
1100	1,883	5.16	2.58	0.86	3.44
Noon	1,956	5.36	2.68	0.89	3.57
1300	1,926	5.28	2.64	0.88	3.52
1400	2,255	6.18	3.09	1.03	4.12
1500	2,676	7.33	3.67	1.22	4.89
1600	2,499	6.85	3.43	1.14	4.57
1700	2,719	7.45	3.73	1.24	4.97
1800	2,913	7.98	3.99	1.33	5.32
1900	2,984	8.18	4.09	1.36	5.45
2000	2,921	8.00	4.00	1.33	5.33
2100	2,562	7.02	3.51	1.17	4.68
2200	2,521	6.91	3.46	1.15	4.61
2300	2,590	7.10	3.55	1.18	4.73
Total	46,400	5.30	2.65	0.85	3.40

This table indicates that the 911 call-driven workload ranges from a low of 0.92 hours from 6:00 a.m. to 7:00 a.m. to a high of 5.45 hours from 7:00 p.m. to 8:00 p.m. In other words, during the hour of 7:00 p.m. to 8:00 p.m. the equivalent of nearly 5.5 officers is required just to handle 911 calls for service.

Relief Factor

The relief factor is a calculation that determines how many personnel must be employed to fill one position for ten hours each day of the year. To calculate the relief factor it is necessary to know on average how many hours a person is scheduled to work and how many hours are actually available to work after accounting for factors such as leave time and training time.

Table 5 shows the experience for 2011 for the Covington Police Department regarding the calculation of the relief factor.

Table 5. *Relief Factor Calculation based on 2011 Actual Experience*

Factor	Average Number of Hours per Officer
Vacation	418
Sick Leave	79
Injury	2
Military	30
Family Leave	3
Bereavement	4
Union Time	4
In-Service Training	47
Specialized Training	21
SWAT Training	19
K-9 Training	10
Personal Days	30
Total	671
Annual Hours Scheduled	2,080
Hours not Available	671
Hours Available	1,409

To fill a position scheduled for ten hours per shift each day of the year requires 3,650 hours. To determine the number of persons that must be hired to fill a position for that number of hours it is necessary to divide the hours available into the hours to be filled. The result in this case is that 2.6 persons must be hired for each position to be filled on a ten-hour shift.

Patrol Staffing Need

In 2011 the department responded to 44,600 emergency calls for service. Based on an estimated average of 40 minutes per call, approximately 30,000 hours of time were needed just to handle 911 calls. The department has 15 sergeants and 61 officers assigned to patrol. If each is

available an average of 1,409 hours there would be 92,994 hours available for all patrol activities.

The International Association of Chiefs of Police uses a standard of allocating one-third of patrol time for 911 calls, one-third of patrol time for directed patrol/officer-initiated activity, and one-third of patrol time for administrative duties. Based on that standard, the current patrol staffing level would have slightly more than 30,000 hours available for 911 demand, approximately one-third of total time. Therefore, the current patrol staffing level is adequate to meet 911 demand and still allow appropriate time for administrative duties, directed patrol and officer-initiated activity.

While the total number of personnel assigned to patrol appears to be adequate, it is important to note from the average hourly demand profile shown in Table 4 above that hourly demand is not uniform. Currently the same number of personnel is assigned to shifts two and three. The conclusion from examining the data in Table 4 is that fewer personnel should be allocated to shift three and moved to shift two. The exact number of personnel to reallocate would be a function of season of the year. It is likely that second shift demand would be higher during spring and summer into fall than winter.

Recommendation 5. Transfer personnel from third shift to second shift to adjust for seasonal changes in demand.

Differential Response

By policy, the Covington Police Department dispatches a patrol unit to every 911 call received in the E-911 Center. If the appropriate unit is not immediately available to respond and if the call is not an immediate priority dispatch, it is put into the unit's queue for response when time and demand permit. This can result in some 911 calls not receiving a response for a long period of time and during high-demand periods this could be hours.

Typically, 911 calls that are the lowest priority in terms of response are also calls that offer little opportunity for an officer to do anything other than take a report. The outcome is often extreme frustration on the part of the caller because of the protracted time it takes for a response and when that occurs, only providing information for an officer's written report. These encounters usually result in a negative transaction that reflects poorly on the department.

Many police departments have initiated a protocol for 911 calls known as differential response. This means that 911 calls are triaged according to a specified protocol and 911 calls that are the most likely to result in nothing other than taking a report are diverted to a protocol that does not require sending a uniformed patrol unit to the site to take the report.

The most common form of call diversion is a telephone reporting system. Such systems use a combination of technology, civilian staff, and light-duty sworn personnel to take reports over the telephone immediately and enter the information into the department's follow-up protocol. Many departments also have the capability to allow 911 callers to be referred to a web site that allows the caller to enter information directly where it is later scrubbed and migrated to the department's follow-up protocol.

The advantage of using a differential response protocol is that patrol unit's time is diverted from low priority report taking effort to activities that have more impact on community safety and security, such as directed patrol and tactical operations.

As mentioned previously, the department has recently installed a state-of-the-art records management system and is working hard to debug systems and migrate historic information to the new database. Consequently, the department was not able to provide information on 911 call volume by type of call. As a result, we are not able to determine with precision the amount of time that patrol units are spending just taking reports. However, based on experience with other departments, it would not be unusual to find that 15% to 20% of 911 calls could be diverted from patrol unit response to a less expensive and more responsive protocol, such as telephone reporting.

Data provided by the Covington Police Department indicates that there were 46,400 calls on the 911 line in 2011. If 20% (9,280) of those calls could be diverted to a telephone reporting unit and the average officer time spent on those calls was 30 minutes to take a report and enter the data, approximately 4,640 hours of officer time would be freed up for activities such as directed patrol or tactical operations.

Recommendation 6. Implement a differential response protocol for 911 calls for service.

Police Records

A sergeant is assigned to the police records section as "records supervisor." Our research indicates that neither police powers nor

training are required for this position. Best practice is to use sworn personnel only in positions that require the use of police powers or training to carry out the duties of the position. In addition to the sergeant, there are 3.5 clerical positions authorized for the records section. Although there are no established performance standards for cycle time for the work of the records clerks, several individuals reported during interviews that all work is not completed on a timely basis.

To improve efficiency in records management, the sergeant's position should be eliminated and one of the records clerks appointed as crew leader. A Covington Police sergeant costs nearly \$98,000 with benefits. The cost of the eliminated sergeant position should be re-directed to fund part-time clerical positions in the records section. Additional positions could assure that records work is completed on a timely basis and allow a telephone reporting system to be implemented without increasing the budget. If 10,000 calls a year were diverted to telephone reporting, the average number of calls per day would be approximately 27, slightly more than one per hour on average.

Recommendation 7. Eliminate the sergeant's position in the records section.

Recommendation 8. Hire part-time clerical positions with the savings from the records sergeant to eliminate records backlogs and support a telephone reporting system.

Special Units

Table 6 shows the deployment plan for Covington Police Department's special units.

Table 6. *Covington Police Department Special Unit Authorized Staffing*

Unit Name	Rank	Authorized Number
School Resource Officer	Specialist	2
Housing Authority	Specialist	2
DEA Task Force	Specialist	1
FBI Safe Streets Task Force	Specialist	1
Community Outreach	Sergeant	1
Community Outreach	Specialist	4*

*Three of these positions were vacant at the time of our interview

Special units should be evaluated in the context of their overall impact on the crime pattern of a jurisdiction as compared to the cost of the unit.

School Resource Officer

Two specialists are assigned to Covington schools and report through the chain of command to the Special Operations Bureau commander. These officers carry out a variety of duties throughout the school year and are reassigned to patrol or take leave when school is not in session.

School resource officers are typically force multipliers in that school districts bear the cost of the officers while school is in session. We were told that the school district pays \$100,000 toward the cost of these two positions. The annual cost of a Grade V police officer is \$89,792, excluding uniform allowance, longevity and automobile.

Housing Authority

Two specialists are assigned to beats and investigations in the Covington Housing Authority projects. These positions report through the chain of command to the Special Operations Bureau commander. The City has budgeted a payment of \$100,000 from the Housing Authority for this service but the amount received will be a product of the amount of time actually used to provide this service.

Drug Enforcement Administration (DEA) Task Force

One specialist is assigned to work with the regional DEA Task Force. That officer reports through the chain of command to the Special Operations Bureau commander. By virtue of participating in the regional narcotics task force, Covington is eligible to receive funds confiscated from drug enforcement operations.

Management Partners was told that Covington expects to receive a \$180,000 allocation as a result of its participation in August of 2012. The amount received varies depending on success, contribution to effort and amount of funds confiscated.

Federal Bureau of Investigation (FBI) Safe Streets Task Force

Covington allocates one specialist to this task force operated by the FBI. The task force focuses regionally on organized crime activity in the region. The FBI does provide some reimbursement for expenses and also shares funds that are confiscated from organized crime operations

according to success, contribution to effort and amount of funds confiscated.

Community Outreach

This unit has been created using department resources and works with neighborhood-based community organizations by attending functions and following up on specific service requests or complaints that originate from those groups. A sergeant and four specialists are assigned to this unit and report through the chain of command to the Special Operations Bureau commander. Three of the specialist positions were vacant at the time of our review.

Analysis of Special Units

The School Resource Officer and Housing Authority units generate income for the City. Because of this, these programs should be considered force multipliers in that housing projects and schools are also demand generators for the Police Department. Having officers assigned to these strategic sites at a fraction of their normal cost is a wise use of resources. It is advisable for the City to examine the amount of reimbursement received from the School District and the Housing Authority to move the reimbursement amount closer to full cost recovery. This is especially important for the Housing Authority since they are federally funded.

The two regional task forces under federal agencies could also be considered force multipliers in that they generate funds from time to time. Although the amount and timing of funding is not predictable, because of the scale of operations the amount can be significant. An additional benefit is that both the DEA and the FBI have provided personnel resources to complement operations that are mounted by the Police Department as a mutual aid effort.

The Community Outreach unit focus seems to be on “quality of life” neighborhood issues and community relations/communications efforts in various Covington neighborhoods. Personnel resources are low at this point since three of the five positions are currently vacant.

Recommendation 9. Continue the school resource officer, housing authority, and DEA and FBI Task Force special units so long as appropriate external funding is forthcoming.

Recommendation 10. Disband the Community Outreach program and incorporate the program mission statement and programs into the Patrol Bureau.

Recommendation 11. Transfer personnel assigned to the Community Outreach unit to the Patrol Bureau.

Recommendation 12. Reclassify the sergeant position in the Community Outreach unit to police officer.

Department Culture

Employee Survey and Focus Groups

Management Partners provided an on-line survey which was open to all members of the department. We also conducted three focus groups to allow us to further explore some elements of the employee survey. The outcomes of the survey and focus groups are presented in Attachment B.

In summary, the employee survey indicated a considerable level of dissatisfaction with department direction and work environment. These feelings were reinforced by information gathered during interviews and focus groups. It is apparent that there is a significant degree of mistrust for command staff among the rank and file. Whether the mistrust is appropriate is not for us to address. However, the presence of the mistrust is appropriate to address.

It is the responsibility of command staff and management to provide constructive leadership and direction to the department. A concerted effort to impact the culture of the department in a positive way should be undertaken by the chief and command/management staff. It would be appropriate to adopt a written “code of behavior” for the chief and command staff and to post that code prominently throughout the department.

We include a sample code that could be used as a starting point by the Covington Police Department. These principles are drawn from management techniques used by Captain Michael Abrashoff of the USS Benfold, the “best damn ship in the Navy,” as articulated in the book *It's Your Ship: Management Techniques from the Best Damn Ship in the Navy*.

Covington Police Department

Command Staff Code of Behavior

(adapted from Michael Abrashoff, *It's Your Ship: Management Techniques from the Best Damn Ship in the Navy*)

The Covington Police Department Command Staff adopts the following principles to lead and manage the personnel of the department.

- Take Command
 - See the department through the eyes of the “crew”
 - Empower the “crew” to fix what’s wrong
 - Focus on performance and readiness
- Lead by Example
 - Articulate goals clearly
 - Provide sufficient time, training and resources to excel
 - Strive for continuous personal improvement
- Listen Aggressively
 - Create a climate of asking
 - Create a climate of suggesting
 - Find round people for round holes
- Communicate Purpose and Meaning
 - Create a climate of “we can do anything”
 - Convey information
 - Strive for continuous organizational improvement
- Create a Climate of Trust
 - Treat everyone with dignity and respect
 - Be relentlessly positive
 - Don’t shoot the messenger
- Look for Results, Not Salutes
 - Use after-action reviews
 - Be open to criticism
 - Praise result-producing performance
 - Innovation knows no rank
- Take Calculated Risks
 - Tolerate mistakes
 - Don’t make the same mistake twice
 - If a rule does not make sense, change it
- Go Beyond Standard Procedure
 - Conformity is not competence
 - Push the envelope for innovation
 - Don’t work harder, work smarter
- Build Up Your People

- Be attentive to people's feelings and potential
 - Expect the best, you will get it
 - Counsel continuously and honestly
 - Discipline strictly but fairly
- Generate Unity
 - Rule #1 – We are all in this together
 - Focus on likenesses and common goals
 - Maximize uniqueness and channel that to common goals
- Improve Your People's Quality of Life
 - In heavy times, lighten up
 - Fun with friends makes for happy people
 - Good play = Good work

Recommendation 13. Adopt a command staff code of behavior and implement the principles aggressively.

Conclusion

This organization review of the Covington Police Department makes recommendations for improving effectiveness while reducing the cost of service. The primary recommendation included in this report has already been acted on by the Covington City Commission when it decided to eliminate its own E-911 Center and obtain service from Kenton County. This action will save Covington in excess of \$1,000,000 annually and will improve customer service in many jurisdictions currently served by Kenton County E-911 by providing a state-of-the-art records management system for the Kenton County E-911 Center.

A reorganization of the command and management staff will provide a leaner management structure and reduce costs by nearly \$500,000 a year. At the same time, the department will be better positioned to implement a CompStat model of police service that has proven to be effective in crime control.

While overall personnel resources are adequate in number, redeployment and repositioning of those resources as recommended in this report will more appropriately match street strength to demand. Integrating special units and power shift assets into the Patrol Bureau as a tactical unit, when combined with accurate and timely intelligence generated by the new RMS, will allow command staff to respond rapidly to crime patterns and trends.

During these difficult times of change and financial belt tightening, department leadership must be acutely tuned to its relationship with its personnel. Initiating this can begin by adopting a command staff code of conduct focused on enabling the lower ranks of the department to continuously improve in their performance.

Fire Department Organization Review

Methodology

The methodology used to review the Fire Department is applied in the context of the severely constrained financial condition of Covington. The geographical configuration of Covington, long and narrow, and the winding and narrow roadway system makes it unusually expensive to meet travel time requirements for the initial attach phase of fire suppression. Given that Fire Department cost is approximately 33% of the non-debt service portion of the operating budget and the stagnating revenue base, it is clear that the current operations model is not sustainable. Since the requirement is to reduce cost, we focused on identifying modifications to operations that would have the best potential for maintaining current service quality levels. In other words, the modifications recommended are not made because they are industry best practices but because the current operations plan is not financially sustainable.

Management Partners provided a project team with deep experience in managing and providing fire services. Project team members interviewed members of the City Commission, the City Manager, Fire Department (CFD) command staff, department managers and supervisors. An on-line survey was conducted to which all sworn and civilian members of the department were invited to respond. Employee survey responses were aggregated and analyzed.

Demand profile data were analyzed for patterns and trends. Organizational reporting relationships were studied for comportment to generally accepted principles of span of control and unity of command. Policies and procedures were compared to industry best practices. Deployment plans and staffing were evaluated for correlation to demand.

Information from the research phase of the study was compiled into preliminary recommendations and presented to Covington officials for discussion. Corrections or clarifications were made to the report to assure accuracy.

The team's review of the CFD used the basic umbrella concepts of "capability," "capacity," and "availability" as a framework for describing

the Covington Fire Department, with each of the three concepts defined as follows:

- Fire department “capability” assesses the scope and depth of emergency services provided to the community, as well as the department’s ability to respond quickly enough and with sufficient resource strength to conduct an effective and safe initial fire attack or rescue action followed by sustained operations, all typically judged against best practices and national standards.
- Fire department “capacity” refers to the ability of a department to handle its typical call workload, simultaneous calls, and multiple alarms using its own resources as well as outside multi-department response agreements. These agreements must already be in-place and functioning, with an emphasis on automatic initial coverage/attack and formalized mutual-aid from adjacent departments, dispatched under a common emergency communications system.
- Fire department “availability” considers how frequent and how lengthy the time periods are when the various emergency response units of a department are unable to service a call for help immediately because they are otherwise engaged in emergency response, or “out-of-service” for an evident reason such as equipment failure, “brownout,” etc.

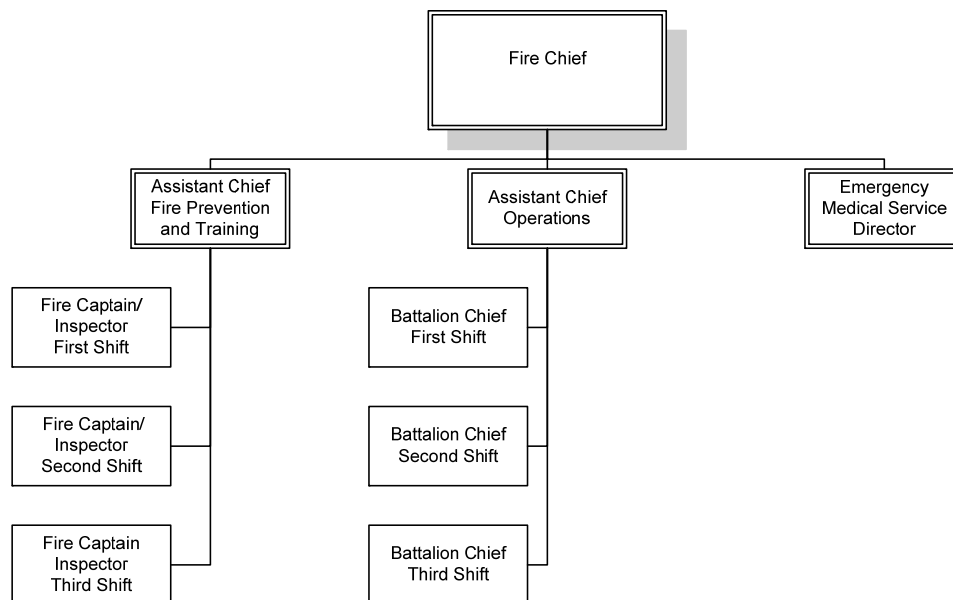
An employee survey was made available to all employees of the fire department. The results of the survey were analyzed as an element of the review of department operations. The analysis of the employee survey is included as Attachment C of this report.

The descriptions and data presented in this report are based on team observations, interviews with CFD officers, and documents furnished by the CFD. Department members gave their time and knowledge freely and cooperatively, and all data requested were promptly supplied to the extent allowed by the very new computerized reporting system operated by the Covington Police Department for both agencies.

Current Organization Plan

The current organization plan for the Covington Fire Department is shown in Figure 3 below.

Figure 3. Covington Fire Department Organization Chart



This description is based on the status of the Covington Fire Department (CFD) as it appeared to the Management Partners project team in early March 2012.

Table 7 shows the authorized positions in the Covington Fire Department for the 2011-12 fiscal year (FY).

Table 7. *Authorized Positions in Fiscal Year 2011-12*

Position Title	Authorized Number
Fire Chief	1
EMS Director	1
Assistant Chief	2
Battalion Chief	3
Captain	12
Lieutenant	18
Engineer	29
Firefighter	52
Administrative Assistant	1
Total	119

The FY 2011-12 budget for the Covington Fire Department is \$12,033,875. Personnel costs, including salaries and benefits, account for \$11,466,085 or 95% of the total budget. The balance, \$567,790, is for non-personnel costs.

The CFD is described in a City publication, the *Covington Resident Handbook*, as a “full service” department providing fire suppression, emergency medical service (EMS), hazard mitigation, fire prevention measures, and fire-life safety public education.

This section of the report focuses on alternative staffing plans for fire suppression and related emergencies as well as EMS. It considers an industry-standard full-service response to those probable emergencies which are judged as entirely possible, based on an examination of the CFD emergency response statistics over the past three years and an extensive hazards analysis “windshield” tour of all neighborhoods of the City.

Demand Profile

Table 8 summarizes the demand for fire suppression and emergency medical service from January through December 2011.

Table 8. *Covington Fire Department Fire and Emergency Medical Service Demand in 2011*

Incident Type	2011 Total	Percent of Total
Ambulance Runs	9,523	76%
Fire Runs	248	2%
Rupture, Explosion	3	0%
Rescue and EMS Assist	1,287	10%
Hazardous Condition (No Fire)	326	3%
Service Call	200	2%
Good Intent Call	248	2%
False Alarm/Call	569	5%
Severe Weather	16	0%
Special Incident	15	0%
Mutual Aid Given	52	0%
TOTAL	12,487	100%

The average number of ambulance runs per day is 26.09. The average number of EMS support runs by fire apparatus is 3.5 per day. The average number of non-EMS fire alarms per day is 4.59 for all types of alarms.

Table 9 shows the volume of fire runs by type.

Table 9. *Fire Run Volume by Types*

Fire Run Type	Number	Percent of Total
Cooking Fire Confined to Container	60	24%
Building Fire	58	24%
Outside Rubbish	40	17%
Vehicle Fire	28	11%
Brush/Grass	11	4%
Dumpster	10	4%
All Other	41	16%
Total	248	100%

Covington Fire Department Resources

For effective emergency response purposes, placement of fire and ambulance stations typically is calculated to provide a “running time” which allows at least 90% of that station’s annual calls to be reached within about four minutes. That time is reasonably lengthened locally, if necessary, by a number of variables. These variables may include type of department, range of services offered, population density, annual call volume, EMS demand, and available budget.

It should be noted that community emergencies are mitigated neither by station buildings nor vehicles alone. Mitigation results from sound prevention and protection measures, and from trained response personnel supported by their stations and equipment according to an affordable plan providing locally defined, reasonably adequate fire, rescue, and EMS delivery, along with firefighter safety provisions. Those decisions and resultant policy are the responsibility of the local municipal “Authority Having Jurisdiction” (AHJ), in this case, officials of the City of Covington.

In early March 2012 the CFD emergency response resource base consisted of the following station personnel, fire station buildings, and fire apparatus and ambulances (some vehicles designed to serve a dual purpose). Five stations, each identified by the term “company,” are listed here as they are located, from the far north of the City to the south of the City. The “company (station) numbers” are not sequential and likely reflect historical changes in the City, the closing of certain interspaced stations and companies, the increased size and weight of fire trucks relative to the capacity of old stations, street and road improvements, etc.

Company 2 is located in a one bay, very small residential-type structure in the northwest at 1252 Parkway Avenue and because of reduced size, barely houses one pumper (engine company).

Company 1, located in a “fire headquarters” building at 100 Robbins Avenue-central business district, is southeast of Company 2 and, in addition to CFD administrative offices, houses one pumper, one ambulance, one aerial ladder truck, and one rescue equipment truck, plus a suburban type vehicle for the on-duty battalion chief. A few miscellaneous other vehicles are housed here.

Company 6 is located in a two-bay station at 1502 Holman Street (in the central business district) and is located fairly close to and south of

Company 1 houses one pumper and one ambulance that is used part-time.

Company 8 is located south of Companies 1 and 6, at 3315 Church Street, with three bays, and houses one pumper, one aerial ladder truck, and two ambulances, one of which is used part-time.

Company 5 is located to the south of the other four stations at 1255 Hands Pike in South Covington, with three bays, and houses one pumper and one ambulance.

When viewed on a City map, the five stations are located approximately on a geographic vertical line extending south from the Ohio River boundary. Various portions of the City boundary are coterminous with about nine other fire department jurisdictions, with Cincinnati and Newport separated by river bridges and the remaining departments in Kenton County.

The primary, “first line” response vehicles of CFD, not counting several reserve vehicles or the unstaffed fire boat used for river incidents, are: five pumpers, two aerial ladders (one of which is equipped with a water pump and other pumper type equipment making it a “quint” apparatus), one rescue/equipment truck, five ambulances, and one incident command suburban, for a total of 14. Currently, two of the five ambulances are in service only during peak demand hours, staffed by crew already on duty and otherwise assigned, unless that shift’s staffing is at an occasionally reached high number exceeding 27. The quint may be used as a pumper or aerial, depending on the need, but would require more than two crew members when used as an engine company.

The emergency response personnel of the CFD who are assigned to each of the three work shifts number a minimum of 27, and are distributed among the five stations. This is a reduction of three firefighter/emergency medical crew members from the earlier thirty minimum per shift prior to October, 2011. The current 27 on-duty responders are composed of one battalion chief who is shift commander, an inspector with the rank of captain who functions as a safety officer and battalion chief’s technical aide and driver as well as the on-duty inspector, and 25 company officers and firefighter/emergency medical responders.

Some emergency medical responders are certified at the paramedic level and thus provide advanced life support (ALS) level service. The personnel not so certified provide “first responder/basic life support (BLS)” level service. CFD ambulances must be staffed with at least one paramedic (of the two crew members) in order to be designated an ALS

ambulance. The CFD vehicle staffing policy is to assign three personnel to a pumper (thus constituting a three-person “engine company”), two personnel to an ambulance, two personnel to the rescue/equipment truck, and two or three personnel to an aerial ladder truck (thus constituting a “truck company”). The CFD tillered tractor aerial truck requires a three-person crew, including the rear “tillerman” driver.

Realizing that two of the 27 on-duty responders (battalion chief and inspector) cannot be assigned to the available 14 fire trucks or ambulances, the remaining minimum staffing number of 25 requires that a selected vehicle or vehicles not be activated that shift, thus imposing a so-called “brownout” of that vehicle or company. Aware of the industry goal of four personnel per engine or ladder company (very seldom if ever attained in the CFD and most other small departments), the department, not wanting to drop to a two person company, currently “browns out” one pumper and distributes personnel so that during peak ambulance demand hours, based on local call statistics, two personnel each at stations 6 and 8 staff the two so-called “part-time” ambulances, in addition to the three full-time ambulances already on duty.

If five personnel have been on duty at a station housing a pumper and ambulance, the engine company is now reduced to three crew members (officer, driver/pump operator, and firefighter) so that the other two personnel may staff the ambulance. If, at a station which is staffed by only three crew members, an ambulance call is received (which takes precedence), the engine company is placed out of service, creating a three-person ambulance company. If an extra paramedic is on shift, a paramedic engine company may be created to provide additional ALS level service for EMS calls.

The CFD staffing protocols recognize that more shift personnel than the number specified by the minimum manning policy or agreement is not often attained, due to sick leave, days off, etc. To fill a shift to the minimum level, “backfilling” using overtime typically is necessary. According to CFD statistical reporting, the staffing “multiplier” requires 4.2 personnel be hired to have one person on duty for each of the three shifts, calculated on an annual basis. The CFD shift hours for all shift-type personnel is 24 on/48 off, with scheduled “Kelly days” off (unpaid) to average 48 hours per week over a three-week period cycle.

In summary, of available CFD emergency response resources, a typical day during March 2011 sees four pumpers (one may be a quint) on station duty with three crew members each (two if quint), one or two aerial ladder trucks with two or three staffing, a rescue/equipment truck with

two crew, a battalion chief and aide, and three ALS two crew ambulances, enhanced by two additional ambulances during peak hours, but resulting then in a reduction of fire suppression initial attack resources. As indicated below, these City-owned emergency response resources may be added to by using mutual aid trucks and personnel from other departments and/or the regional rescue team, recognizing that mutual-aid requires that CFD respond out-of-City when so requested, thus reducing its own resource base.

Best Practice Parameters for Service Delivery

Glossary of Related Terms

System Terms

Mutual Aid: Outside department assistance summoned to the incident after the home department has arrived and determined aid is needed.

Automatic Mutual Aid: Outside department units dispatched by pre-arrangement, simultaneously with the home department.

Nearest Station Response: Dispatching initial units from whichever station is closest to the incident and has units “in quarters” at that time.

CAD: Computer aided dispatch; typically utilizing specialized hardware, software, and a radio communication system, located at a specialized facility staffed by trained dispatchers; currently the Covington Police Department’s 9-1-1 and dispatch center.

PSAP: Public Safety Answering Point; the facility, run by the Covington Police Department, into which 9-1-1 telephone calls for help are received by call takers and dispatchers.

Medical Dispatch: Dispatcher’s guidance to 9-1-1 callers for emergency medical assistance; typically follows a medically approved question-answer-guidance telephone format.

Requirements and Standards Terms

OSHA Requirements: Mandatory obligations applied by federal and state OSHA.

OSHA “Best Practice” advisories, such as *Best Practices for Protecting EMS Responders During Treatment and Transport of Victims of Hazardous Substance Releases*.

NIOSH: National Institute for Occupational Safety and Health; conducts relevant fire department incident analyses, investigates all firefighter line-

of-duty deaths, inspects equipment involved in incident happenings, and issues advisories.

NFPA: National Fire Protection Association issues consensus-based standards which, although not legal requirements, may be judged in legal proceedings to have the weight of law. Those related most directly to CFD include:

- NFPA 1500 “Standard on Fire Department Occupational Safety and Health Program”
- NFPA 1710 “Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments”

Emergency Response Units and Personnel Terms

Engine Company: Pumper apparatus and full crew (the industry standard and best practice is four personnel).

Ladder Company: Aerial ladder truck and crew.

Ambulance: A transport ambulance at basic (BLS) or advanced life support (ALS) level. ALS requires staffing by at least one certified paramedic.

Squad: Specialized vehicle carrying equipment used at technical rescue incidents such as confined space, trench collapse, high-angle, machinery, vehicle crash, building collapse, mountain rescue, incidents Cover or Fill-in Company: Appropriate apparatus and crew moved to a critical but emptied station in order to cover new alarms.

EMT: Emergency Medical Technician trained and certified as a pre-hospital provider:

- First Responder (initial aid provider, defibrillator trained)
- EMT-Basic (trained at a basic level, not using invasive procedures)
- EMT-Intermediate (certified for some advanced procedures)
- EMT-Paramedic (certified for advanced life support protocols and some invasive procedures and operating under the license and direction of a physician director).

Paramedic Vehicle (engine, ambulance): ALS equipped and staffed to include at least one paramedic.

Technical Rescue: Appropriate equipment and crew trained to perform technical rescues at confined space, high angle, industrial equipment, mountain incidents, vehicle crashes, etc.

Rapid Intervention Team: Crew standing-by solely to rescue endangered firefighters. Required by both OSHA and NFPA, the initial two-person team must be increased to four at working incidents. No personnel assigned as such a team is allowed to perform any other tasks except to stand-by or enter the structure for rescue of downed firefighters. Note that this requires *additional* responders at the scene. Further, best practices do not include assigning a responding ambulance (medic) crew to tasks other than conducting emergency medical services at the incident.

Incident Command: Refers to the officer responsible for all incident activities, plus various command functions and protocols.

Safety Officer: Personnel at the scene with authority to override the Incident Commander if firefighter safety is endangered. This is both an OSHA and NFPA practice.

Summary of Basic Applicable National Standards

In summary form, the national standard for response *travel time* goals of which Covington City officials should be aware, and which reflect the typical exponential increase in structural fire growth include:

Fire Suppression Incident

Four minutes (240 seconds) or less for the arrival of the first-arriving engine company at a fire suppression or related incident and eight minutes (480 seconds) or less for the deployment of a full first-alarm assignment at that fire suppression incident; these times referring to travel time only.

The group of firefighters servicing the first due engine company should consist of a minimum of four trained and equipped personnel. The group of firefighters servicing a full first-alarm assignment of apparatus (maximum of eight minutes 0 seconds arrival on scene), should consist of a minimum of fifteen trained and equipped responders for a single, detached, dwelling fire.

The OSHA “two in-two out” regulation and NFPA Standard 1500 call for the presence of a minimum of four firefighters before entry may be made into an area which is immediately dangerous to life and health (IDLH fire

area) unless it clearly is evident that a successful rescue may be accomplished. No fewer than two personnel remaining with visual or voice contact with each other may enter an IDLH area.

Working fires and similar incidents require the presence of a “Rapid Intervention Team” consisting of a minimum of four firefighters standing by for rescue entry, as specified by OSHA.

Emergency Medical Incident

Four minutes (240 seconds) or less for the arrival of a unit with first responder and defibrillator (or higher) level capability at an emergency medical incident. Eight minutes (480 seconds) or less for the arrival of an ALS unit at an emergency medical incident, where this service is provided by the fire department.

These travel time allowances do not include dispatch and turn-out time. One additional minute is allowed for dispatch and one minute is added for turn-out time, for a total of two minutes, unless local experience or practices differ, as they well may in cases where volunteers are utilized.

Fire Fighting and Related Standard Details

OSHA calls for the following operational safety measures nationally, or for OSHA-approved state plans:

“Once fire fighters begin the interior attack on an interior structural fire, the atmosphere is assumed to be IDLH (immediately dangerous to life and health), and paragraph 29 CFR 1910.134(g)(4) (two-in/two-out) applies.”(See below)

All engaged in interior structural fire fighting must wear SCBAs, work in teams of two or more, and maintain *voice or visual contact* (not radio).

29CFR 1910.134

Initially, at an interior structural fire, four individuals are required (*minimum*), two as an interior team and two outside for rapid assistance or rescue. (29 CFR 1910.134(g)(4)) (Exception is a *known* life-hazard situation requiring immediate action.)

The National Fire Protection Association issues standards for firefighting operations. Although NFPA standards are legally binding only in those communities which formally adopt them, they do represent national/industry standards and are used in expert testimony to describe a

“Reasonable Person Standard” and a scientifically derived “Standard of Care when a Standard of Duty exists.”

NFPA Standard 1710 provisions include:

- “The number of (firefighters) shall be sufficient ... given the expected fire-fighting conditions.” (5.2.2)
- “On-duty personnel ... shall be organized into company units ...” (5.2.2.2)
- “Supervisory chief officers shall be dispatched to all full alarm assignments.” (5.2.2.2.3)
- “These companies shall be staffed with a minimum of four on-duty personnel.” (engines and ladders) (5.2.3.1.1)
- “In (special areas) ... companies shall be staffed with a minimum of five or six members.” (5.2.3.1.2)
- “... Provide for the arrival of an engine company within a 240 second travel time to 90 percent of incidents.” (5.2.4.1.1)
- “... Deploy an initial full alarm assignment within a 480-second travel time to 90 percent of the incidents.” (5.2.4.2.1)
- “The initial full alarm assignment to a structure fire in a (2000 sq. ft., two-story) single family dwelling with no basement or exposures shall provide for Incident Commander plus 14 personnel (minimum), with duties outlined in 8 sub-sections) “ (5.2.4.2.2)
- “... (response) to occupancies with hazards greater (than above) shall deploy additional resources on the initial alarm” (5.2.4.2.3)
- “... (escalating) beyond an initial full alarm assignment ... upgrade to a full four person or larger Rapid Intervention Crew”, plus a Safety Officer” (5.2.4.3.3. & 4.)”

Pre-Hospital Emergency Medical Standard Details

NFPA Standard 1710 calls for emergency medical assistance, including automatic external defibrillator application when needed, to begin within 240 seconds travel time and, if not at the ALS level, ALS service must arrive within 480 seconds if ALS is needed.

The Standard 1710 key response times (for EMS, fire, and rescue calls) of four minutes zero seconds and eight minutes zero seconds do not include

call handling and dispatch time at the 9-1-1/dispatch center (these are outlined in specific NFPA and other standards), nor do they include the “turn out time” at the station which is assumed nationally not to exceed 60 seconds. Rather, the four and eight minute times are defined as “road/travel/wheels turning” time from fire station ramp to the incident scene. Standard 1710 calls for those travel times to be met for a minimum of 90% of the annual incidents. Of course, there typically is additional delay at the scene for officer size-up and set-up of equipment.

Legal Considerations

Departments are subject to legally imposed sanctions, but often are judged additionally in emergency medical litigation by the “advisories” promulgated by the American Heart and Medical Associations, which establish a basis for determining an accepted standard of care.

The basic research regarding emergency response time and standard of care protocols as they relate to survivability of persons suffering cardiac arrest began in the Seattle-King County, Washington area. Since the early 90s, the still nationally used Eisenberg Model (*Annals of Emergency Medicine*, November 1993 “Predicting Survival From Out-Of-Hospital Cardiac Arrest: A Graphic Model”), serves as a basis for the “Guidelines for Cardiopulmonary Resuscitation and Emergency Cardiac Care” which is updated periodically by the American Heart Association.

Survival rate statistics included in the research, based on arrival time of paramedics, demonstrate that the survival rate of *potential survivors* increases from 6.9% to 51.0% if CPR begins at five minutes, defibrillation at six, and advanced cardiac life support (ALS/paramedic) at seven, rather than a longer response time producing CPR at 10, defibrillation at 11, and ACLS at 13 minutes (“Effectiveness of Fire-Based EMS”, IAFF, undated, derived from the Eisenberg Study). Five minutes faster response time and corresponding care protocols at the scene appear to produce a significant improvement in survivability.

Table 10 shows data often used in fire department/EMS performance studies. It presents a very approximate summary of both heart and severe trauma recovery percentages combined, based on available data:

Table 10. *Chance of Recovery from Heart and Severe Trauma Incidents (non-breathing) Statistics from King County, Washington*

Chance of Recovery	Contrasted with Response Times in Minutes after Breathing Stops
98%	1
92%	2
72%	3
50%	4
25%	5
11%	6
8%	7
5%	8
2%	9
.05%	10

Because response time is so critical in reducing mortality from cardiac events, as early as 1992 the American Medical Association and the American Heart Association established the following industry standard for emergency response to a cardiac arrest:

For cardiac arrest, the highest hospital discharge rate has been achieved in patients in whom CPR was initiated within 4 minutes of arrest and ACLS within 8 minutes. Early bystander rescue breathing as CPR intervention and fast emergency medical services (EMS) response are therefore essential in improving survival rates and good neurological recovery rates. (The Journal of the American Medical Association; "Guideline for Cardiopulmonary Resuscitation and Emergency Cardiac Care," Vol. 268, No. 76; October 28, 1992; p.2184)¹

Judicial decisions often are based on non-mandated "industry standards" or "prudent man behavior" or "standard of care" concepts.

¹ The Journal of the American Medical Association; "Guideline for Cardiopulmonary Resuscitation and Emergency Cardiac Care," Vol. 268, No. 76; October 28, 1992; p.2184)

Covington Fire Department Capability, Capacity, Availability

CFD Capability: Observations

Emergency medical service is provided through three full-time ambulances and two additional ambulances on a periodic basis depending on daily personnel resources. All ambulances have at least one ALS-qualified technician and one BLS technician assigned. All EMS operations are carried out under the license of a board certified physician serving as the medical director for the Fire Department.

Ambulances are fully equipped for providing on-site stabilization of patients and transport to the nearest appropriate treatment facility. Fire apparatus is dispatched when an ambulance crew needs assistance lifting a patient or with on-site control measures. The Covington Police Department also dispatches a unit to emergency medical service calls. The CFD routinely meets the American Heart Association standards for emergency medical service.

Fire suppression incidents in Covington are responded to by CFD as appropriately as the existing resources allow. A structure fire response typically is judged as an indicator of a department's strength, and CFD responds appropriately with two engines, one ladder truck, the rescue truck, and the battalion chief. Depending on the fire response zone indicated, which determines the appropriate station response, the number of personnel assigned to those dispatched vehicles on a typical shift day could range from 13 to 14. The higher number of responders would include a five-person engine company, a three-person engine company, a two-person ladder company, two crew on the rescue truck, the battalion chief, and the inspector.

That magnitude of dispatch would leave two engine companies, one ladder company, and two ambulances remaining in the City's stations to handle EMS calls and another fire alarm or an escalation of the existing fire. With 14 personnel at the existing fire, 13 station responders would be remaining. It may be assumed that mutual aid companies from outside departments would be called into the City to cover stations and

respond to calls at some point in this scenario. As noted, national staffing standards are not met by the CFD. A desired “service delivery level” policy statement issued by the AHJ is needed as any forthcoming department changes are planned and implemented.

Hazardous materials incidents in Covington are responded to by CFD at only the very basic “first responder” level. The Fire Chief states that it is neither trained nor equipped to mitigate, control, and terminate HazMat incidents and is dependent on a regional team comprised of trained personnel from Kenton and Boone County jurisdictions and special districts for technical level service and incident command.

Technical rescue services currently are provided by several trained personnel assigned for duty each shift, and equipped essentially, by the items carried on the department’s rescue truck. This truck is staffed by two firefighters and housed at Station 1 in the northern section of Covington.

Vehicle extrication is considered a technical rescue operation, but not all pumpers are appropriately equipped, thus requiring that the rescue truck be dispatched to all vehicle accidents. (The rescue truck and its two personnel also function as a “flying squad” throughout the City, transporting two firefighters to augment the pumper and aerial crew members. As such, it might have more effective response times, on average, to structure fires in all parts of the City if housed more centrally.)

If the CFD operating protocol for vehicle accidents is to respond to all vehicle accidents with an engine and the rescue truck plus an ambulance, one possible alternative (as an example only) might be to equip each pumper with appropriate equipment, dispatching the rescue unit only when necessary for additional equipment or personnel. The purpose here is to keep the “flying squad” of two additional firefighters as available as possible for dispatch to structure fires and other incident calls throughout Covington. For mutual aid to Newport requiring an aerial ladder, the CFD rescue is also sent with the two firefighters.

A well-equipped and trained technical rescue group serves the region. As with HazMat incidents, this group assembles and proceeds to the Covington incident scene with a specialized vehicle. A few CFD firefighters are members of this regional team. Although a time lapse exists between the call from Covington for special aid and the team’s arrival, the team can handle a wider variety of rescue incidents than can be handled locally. It would be best, however, if all CFD personnel could

have training in the basics of all types of technical rescue incidents which might be anticipated within the City, thus speeding the set-up and mitigation work necessary for effective and safe rescue operations.

CFD Capacity: Observations

The capacity of CFD to handle its typical, common daily workload of calls may be measured by the number of calls of various types to which it can respond with appropriate numbers and types of vehicles plus an appropriate number of trained personnel, including an incident commander. The CFD responds, over the year, to a wide variety of calls. During the year 2011 the department answered 32 types of alarms more than 20 times each. Examples include 249 “fire” type calls, 556 calls involving motor vehicles, 60 gas leaks and 569 false alarm/false calls. The CFD total incident count for that one year period was 2,914, or an average of about 8 calls per 24 hour day, exclusive of the 9,523 ambulance calls which are tallied separately. CFD responded approximately 50 times to provide mutual aid to other departments during 2011, and received mutual aid into the City approximately 69 times.

Almost all calls involve more than one truck responding. Prior to the institution of two part-time (peak demand) ambulances, approximately 450 mutual aid ambulance runs were made into Covington annually. That number now is reduced to approximately 50.

As calculated under the “capability” heading, the CFD would be hard pressed to provide initial attack and sustained operations simultaneously at two different working structure fires, or one multiple alarm fire, without mutual aid. This is a reflection of the best practice which calls for an uninvolved ambulance and crew to be standing-by at a working structure fire, and for a safety officer to be present, and for a four-person Rapid Intervention Team (RIT) to be standing clear at the scene. Those requirements, if observed, necessitate mutual aid companies at the incident and also covering empty Covington stations.

Carefully formulated and written, mutual-aid agreements are necessary for reasonably adequate fire, rescue, and EMS delivery within Covington. The advantage of automatic mutual aid to the City is clear: automatic aid recognizes that, often, time is of the essence and the uncertainty of responding aid is greatly reduced.

CFD Availability: Observations

The availability of CFD regarding emergency response is a function of workload and the available “in-house” resource base. There have been no reported incidents when CFD has been unable to respond immediately to a call or alarm, but there are instances when a mutual aid company has responded to aid, or very occasionally to take the call because CFD has not had an available resource to dispatch immediately. Unlike many types of police calls, most fire/EMS calls should not be placed in a response queue. Therefore, except in sufficiently large fire departments, mutual aid of one type or another is frequently necessary. The addition of RIT obligations as well as other OSHA mandates very often creates an additional need for mutual aid assistance.

The institution by CFD of peak-time ambulance service by two additional ambulances illustrates the inability to request aid from an outside department on a too regular or frequent basis; departments are legally and morally obligated to first serve their own communities. However, contract service falls outside the mutual aid construct, but requires a carefully crafted, performance-based agreement with frequent monitoring.

Three areas of concern regarding any type of mutual aid agreement or contract for services are speed of response to the incident, strength of response, and instant availability. Automatic mutual aid agreements are especially dependent on common dispatch and communication systems and carefully considered “running card” assignments. Well established regional models, such as mutual aid box alarm system (MABAS) are available for replication. This report recognizes that the Covington area and northern Kentucky are well experienced in the use of mutual aid, but are handicapped by the multiplicity of 9-1-1 PSAPs and dispatch systems.

This report notes that effective and obviously useful mutual-aid not only increases availability, but leads to broader “functional consolidation” and when desired, to regionalization of at least some protective services.

Alternative Staffing Plans

Covington faces difficult financial conditions. Its financial exigencies are such that it may be necessary to reduce resources allocated to the Fire Department. In this circumstance it is prudent to evaluate the impact of alternative staffing plans on service quality and financial conditions should Covington find it necessary to implement budget reductions. As indicated earlier, 95% of the department budget is allocated to personnel cost and 118 of the 119 authorized positions are sworn firefighters. This makes it necessary to examine alternative staffing plans for emergency medical service and fire suppression.

Management Partners has analyzed four options for reducing the number of on duty personnel:

- Contract emergency medical services to a third-party vendor
- Separate emergency medical service from the Fire Department and create a new City agency to provide such service
- Eliminate staffing for the quint on a daily basis and place the apparatus in reserve status.
- Eliminate pumper Company 5 and negotiate automatic aid agreements with Taylor Mill and Independence fire districts

Each of these alternatives is discussed and compared for service quality levels to the current service plan in the following sections of the report. The analysis also includes an estimate of the financial impact and identifies the issues that Covington officials would need to consider as they examine their options.

Emergency Medical Service

Covington currently has three ALS/transport ambulances in service around the clock. The Fire Department also periodically staffs two additional ALS/transport ambulances as personnel resources permit. The service level quality provided meets American Heart Association standards for ALS and basic life support service.

There are two persons per ambulance, one of whom is an ALS certified paramedic. This equates to six persons per tour of duty. The relief factor for Covington Fire Department 24 hour tour personnel is 4.2. Thus there are 25 full-time-equivalent (FTE) positions assigned to EMS. Emergency medical service operations are under the direction of the EMS director. Table 11 below presents the cost of EMS for Covington based on 2011 budget information supplied by Covington staff.

Table 11. *Covington's Cost of EMS*

Cost Element	Average Salary	Benefits	Unit Cost or Revenue	Number of Positions or Vehicles	Years Life	Total Annual Cost or Revenue
Ambulance Staff	\$54,595	\$40,349	\$94,944	25	NA	\$2,373,600
EMS Director	\$85,368	\$52,664	\$138,032	1	NA	\$138,032
Medical Supplies	NA	NA	\$110,000	NA	NA	\$110,000
Capital Cost/Ambulance	NA	NA	\$160,000	5	7	\$114,286
Total Expense	\$139,963	\$93,013	\$502,976	NA	NA	\$2,735,918
Revenue Collected	NA	NA	\$1,200,000	NA	NA	\$1,200,000
Net Expense	NA	NA	NA	NA	NA	\$1,535,918

As this table indicates the approximate annual net expense to Covington for EMS is in excess of \$1,500,000.

EMS Alternative A: Contract for EMS with a Private Vendor

Service Description

Several private for-profit companies provide EMS to jurisdictions on contract. One, Rural Metro Inc., serves numerous jurisdictions throughout Kentucky. Management Partners contacted Rural Metro to get information on its contracting process, pricing methodology and service level quality. The agent for Rural Metro indicated that they do not use a "cookie cutter" approach. Rather, they meet with the appropriate officials to establish a desired service quality level and then prepare a cost proposal accordingly. The agent indicated that the cost proposal is net of anticipated revenue collection. The contract is performance-based in that the contract includes expected service quality level and a reporting system compared with performance standards.

Analysis

The current service quality level provided by the Fire Department could easily be specified in the contract for service so there would be no diminution of quality. Rural Metro would not provide a price proposal without in depth discussions with Covington officials, so it is not possible to determine what, if any, economic benefit there would be. What can be determined is that if a private vendor, such as Rural Metro, could provide the current service quality level for less than a price of \$1,500,000 there would be an economic benefit. The current number of four pumper companies for fire suppression purposes should remain in place since there would be a loss of six potential fire fighting personnel if the fire department no longer has EMS personnel to deploy.

Contracting EMS to a third party would degrade the Fire Department's fire suppression capacity. Best practice is that a structure fire requires 15 personnel on site, including a four-person RIT, a two-person ambulance crew, a two-person heavy rescue crew, an incident commander, a safety officer, and a five-person attack team. Contracting for EMS would reduce the daily minimum staffing from 27 to 21 persons since three two-person ambulances would no longer be needed.

Accounting for the EMS vendor providing the two-person ambulance crew would mean that Covington would provide 13 or 14 personnel for the initial attack. That would leave 7 or 8 personnel in station. Specifically, the ability to provide sufficient personnel for initial attack and sustained operations or a second simultaneous structure fire would require mutual/automatic aid assistance. In 2011 there were a total of 58 building fires, an average of one every 6 days. Historical analysis would indicate that the risk of two simultaneous building fires is low and that mutual aid from career departments such as Newport and Cincinnati are in place should that occur.

Once a jurisdiction contracts EMS to a third party, it would be time-consuming and require considerable capital expense to terminate the contract and re-start the service with its own employees and equipment. If Covington continues to provide a first responder service with its Fire Department there is the possibility of friction with the EMS vendor at the scene that could lead to labor issues and/or patient care issues.

Recommendation 14. Prepare a request for proposal for third-party vendor emergency medical services based on the current service quality level provided by the Covington Fire Department.

Recommendation 15. Analyze proposals received for potential cost, benefits and issues.

EMS Alternative B: Create a Separate EMS Organizational Entity in the City Government

Service Description

The alternative staffing plan creates an EMS organizational entity separate from the Covington Fire Department. The advantage of this plan is that since the ambulance crew would not be required to suppress fires, the City's pension contribution would be reduced by over \$9,000 per person. In addition, the shift schedule could be changed from a 24-hour tour to an eight-hour tour, allowing a reduction of ambulance crews on duty during the low demand hours each day.

Analysis

Table 12 below presents the cost comparison of the current staffing plan and Alternative B.

Table 12. *Cost Comparison of Current EMS Service to Separate Organization Entity*

	Number of Personnel	Salary	Benefits	Medical Supplies	Ambulance	Total Cost
Current	25	\$1,450,243	\$1,061,389	\$110,000	\$114,280	\$2,735,912
Alternative B	22	\$1,286,458	\$742,878	\$110,000	\$114,280	\$2,252,616
Difference	-3	-\$163,785	-\$318,260	\$0	\$0	-\$483,294

The cost difference of nearly \$500,000 is a result of having three fewer personnel due to flexible scheduling to match demand and the non-hazardous duty pension cost. This would maintain the current service quality level for most hours of the day but could result in longer travel times during the hours of 2 a.m. to 7 a.m.

Alternative B assumes that ambulances would be located in fire station facilities and that appropriate automatic aid agreements could be concluded with neighboring jurisdictions. The current number of four pumper companies for fire suppression purposes should remain in place since there would be a loss of six potential fire fighting personnel if the fire department no longer has EMS personnel to deploy.

Locating EMS outside of the Fire Department would have the same impact as contracting with a third-party vendor to provide EMS. The impact on fire suppression capacity is described above in Alternative A.

Locating ambulances under the jurisdiction of a separate entity from the Fire Department in fire stations may prove to be untenable from a labor relations point of view, especially if current Covington firefighters do not transfer to the separate entity and it becomes necessary to recruit from non-Covington resources. It might be necessary to station ambulances near to the fire stations since they are strategically located.

The logistics of staffing if there are few transfers from current Covington firefighters could be time-consuming and complicated. An incentive should be considered so that any current firefighter who does transfer would gain automatic preference to fill a vacancy in the fire department.

Recommendation 16. Pursue EMS Alternative A first, then compare the economic benefit and service quality level of fire suppression of that Alternative to Alternative B.

Fire Suppression

Currently, the Covington Fire Department has the following resources available for fire suppression:

- Company 1
 - Battalion chief; inspector; seven to ten firefighters
 - Ambulance; rescue truck; aerial truck; pumper (unless browned out)
- Company 2
 - Three firefighters
 - Pumper
- Company 5
 - Five firefighters
 - Pumper; ambulance
- Company 6
 - Three firefighters
 - Pumper; part-time ambulance
- Company 8
 - Seven firefighters
 - Ambulance; part-time ambulance; aerial truck; pumper

Fire Suppression Staffing Alternative

The current operations plan for the Covington Fire Department includes a tillered aerial apparatus located in Station 1 and a quint located at Station 8. Management Partners analyzed the impact of eliminating daily staffing of the quint should Covington's financial situation require cost reductions in fire suppression.

Service Description

This option would result in eliminating one aerial unit, reducing the number of units from two to one on duty around the clock and placing the quint in reserve status. The quint is staffed by two fire fighters and is responsible for search and rescue and sustained operations support.

Analysis

This analysis assumes that EMS will continue as currently operated and organized in the Covington Fire Department. Ambulance personnel are currently also assets utilized for fire suppression. Table 13 presents the personnel cost of a Covington Fire Department quint unit. .

Table 13. *Personnel Cost of a Covington Fire Department Quint*

Position Title	Number of Positions	Salary Cost	Benefits Cost	Unit Cost	Relief Factor	Total Cost
Lieutenant	1	\$ 55,824	\$40,841	\$ 96,665	4.2	\$405,993
Engineer	1	\$ 52,662	\$39,575	\$ 92,237	4.2	\$387,395
Total	2	\$108,486	\$80,416	\$188,902	NA	\$793,388

As the table indicates, the cost of a quint unit is approximately \$800,000.

As noted previously, best practice is that a structure fire requires 14 personnel on site, including a four-person RIT, a two-person ambulance crew, a two-person heavy rescue crew, an incident commander, and a five-person attack team. Eliminating the quint would reduce the daily minimum staffing from 27 to 25. That would leave 11 personnel in station in the event of a multiple alarm fire or a simultaneous incident.

The ability to provide sufficient personnel for initial attack and sustained operations at a second simultaneous structure fire currently requires mutual/automatic aid assistance. This situation would not change as a result of eliminating the quint. Thus the primary rationale for responding to cost reduction requirements by eliminating the quint is that it will not

impact current service quality level. As mentioned previously, in 2011 there were a total of 58 building fires, an average of one every 6 days. Historical analysis indicates that the risk of two simultaneous building fires is low and that mutual aid from career departments such as Newport and Cincinnati are in place should that occur.

Recommendation 17. Eliminate daily staffing of the quint located at Station 8 if cost reductions in fire suppression staffing are necessary. Place the apparatus in reserve status.

Regional Fire and Emergency Services

Our analysis of eliminating Company 5 and implementing automatic aid agreements with the Independence and Taylor Mill districts produced the results described below. Management Partners included the analysis of this alternative because the South Covington Station has the lowest demand for service of all the Covington stations and due diligence would require our team to examine this option.

Service Description

With this alternative, pumper Company 5 would be eliminated and the EMS ambulance would remain in service. The pumper would remain in the station and be used by the ambulance crew to respond to fire calls from the station. Automatic aid agreements with Taylor Mill and Independence Fire Districts would be negotiated to provide initial attack and sustained operations support, which would be possible when Covington, Taylor Mill and Independence all get 911 support from Kenton County.

Analysis

Pumper Company 5 is stationed the furthest south of all apparatus and is the first responder for fire and EMS calls in South Covington. It is the least busy of all apparatus with 163 fire runs and 63 EMS runs in 2011. This is less than one run per day.

Pumper Company 5's service area is closer to Taylor Mill and Independence Fire Districts than to other Covington fire stations. However, the Independence station cannot reach the majority of Pumper 5's service area in the four minutes or less travel time currently achieved. The Taylor Mill station is a combined (career service and volunteer augmented) service. The Taylor Mill station has two-person staffing

around the clock. However, the response protocol is that their company does not leave the station until four minutes after initial tones in order to allow volunteers time to reach the apparatus before it leaves the station. When this time is added to the travel time, most of the Pumper 5 service area would see response time standards significantly degraded from those currently achieved for initial attack. Travel time for sustained operations should not experience a detrimental impact since those resources would be drawn from Covington stations as is the case currently.

The key to making this plan work is the ability to negotiate workable automatic aid agreements with Taylor Mill and Independence Fire Districts. This plan, in essence, transfers workload from Covington to those two districts. To minimize any degradation of initial attack capacity and capability in the service area, Taylor Mill must agree to change its response protocol by abandoning the four-minute post tones wait time before leaving the station. There is likely to be a question of whether Covington should provide some form of payment to the two districts for stand-by and actual responses.

This alternative has the greatest impact on service quality of all options. Even with the optimum automatic aid agreement possible with current station locations and configurations there will be a degradation of initial attack standards compared to the current service level. Covington officials must be prepared to have a justification for this seeming disparity of service levels among Covington neighborhoods.

And, over time, Covington would be subject to the impact of decisions made by Taylor Mill and Independence Fire District officials regarding plans and operations that are not the most favorable from Covington's point of view. Taylor Mill and Independence Fire Districts could agree to the plan initially and then want to negotiate payment terms that could wind up being unfavorable for Covington, resulting in the need to backtrack.

This is not considered to be a viable option as analyzed. However, the analysis does lead to the conclusion that providing regional fire suppression and EMS has the potential to lead to significant cost reductions for all jurisdictions providing such service. Understanding this potential requires a projection into the future based on current trends.

Southern Kenton County is growing as is Campbell County, and Boone County is among the fastest growing jurisdictions in Kentucky. This

growth, as well as changing life styles, will make it less likely that all volunteer or even combination professional/volunteer fire and EMS operations will be viable operating models certainly in the long term and more than likely in the near term. As high population growth or even population dispersal with low growth demands construction of new facilities with new apparatus and ambulances, capital costs will run into the millions of dollars. Growing demand for career service personnel as opposed to volunteers will result in additional millions of cost.

As Northern Kentucky's elected officials are discovering with regard to the E-911 center, regionalizing fire and emergency medical service has the potential for multi-million dollars of cost avoidance. Covington officials, as leaders of the region's largest city would serve their residents well by initiating analysis and discussion of regionalizing these services

Recommendation 18. Initiate discussions of regional fire and EMS among Northern Kentucky officials.

EMS Alternative A and Eliminating Quint Staffing

Covington's financial condition could be such that it becomes necessary to adopt alternative staffing plans for EMS and fire suppression. This alternative analyzes the impact of implementing Alternative A in EMS and eliminating quint staffing.

Service Description

EMS would be contracted to a third-party vendor and quint staffing would be eliminated and the quint placed in reserve status.

Analysis

As specified in the analysis of EMS Alternative A, a contract with an EMS vendor would have to be negotiated. The potential savings from this is unknown but any net expense that is \$1.5 million or less would represent an economic advantage for Covington. As described in Fire Suppression Alternative Staffing analysis, eliminating the quint would reduce cost by approximately \$800,000.

Minimum staffing would be reduced from 27 to 19. As described earlier, fighting a building fire would require that Covington mobilize 13 on-duty personnel at a minimum. (The EMS vendor would provide the on-site ambulance crew.) Doing so would leave six personnel in station for a second simultaneous building fire. We have pointed out previously the importance of mutual aid agreements in this context and have also

previously described the experience history that would indicate a low level risk of a second simultaneous building fire.

It is possible that the cost-saving impact of this course of action could be approximately \$2.3 million a year.

Recommendation 19. Privatize EMS and eliminate daily quint staffing if dictated by Covington's financial condition.

Fire Station Relocation

In October of 2011, minimum staffing was reduced from 30 to 27. The resulting operations modification was to "brown out" Pumper Company 1. As a result, there are four pumper companies under the "normal" operating condition. On rare occasions when low vacation season coincides with low sick leave usage, a fifth pumper can be staffed. However, this is the exception rather than the rule.

With a normal availability of four pumpers, Covington should give consideration to repositioning fire station locations to provide better travel time coverage. This would be best achieved by closing Stations 1 and 2 and building a new station to the north of current station 1. This facility would also serve as department headquarters.

Because a relocated station would provide better travel time coverage for pumper companies, it would not be a first priority to staff a fifth pumper during those occasions when the minimum staffing is exceeded due to low leave usage periods. If Covington continues to provide EMS through the Fire Department rather than an alternative model, an additional ambulance could be staffed since EMS has fivefold higher demand than fire runs. If Covington uses an alternative to the current EMS model, excess staffing could be placed on the reserve quint.

Our research indicates that a new fire station should be a two-story 20,000 square foot building that would cost approximately \$2.9 million to construct. We understand that Covington has already received a \$300,000 grant to purchase the land.

Options for funding the cost of construction are available to the City. Tax exempt municipal bonds with a 30-year life at 5% interest would require annual debt service of approximately \$190,000 or about 17% of the annual cost of a pumper unit. Another alternative to explore would be for a private owner to construct a station and enter into a long-term lease agreement with Covington. A public/private partnership using Industrial

Revenue Bonds might also be a financing path to pursue. These are only a few of the financing options to consider.

Recommendation 20. Replace stations 1 and 2 with a new station to the north of current station 1.

Fire Inspections

Currently, one captain/fire inspector position is authorized for each 24-hour duty tour; a total of three positions. The position primarily carries out commercial inspection duties and reports to an assistant fire chief.

Business occupancies, including residential multi-family occupancies, are inspected on an annual basis. Fire companies are also delegated responsibility for inspecting commercial uses in their service zone. Most inspection duties are completed during daytime hours when a productive encounter with the property owner is most likely. Entertainment occupancies are sometimes inspected during evening/nighttime hours to assure that occupancy loading is within approved limits.

The position also is detailed to drive the battalion chief to fire responses and act as incident safety officer at structure fires. These duties are carried out if the captain/fire inspector is present at Company 1 when an alarm sounds.

The primary duty of this position, fire inspection, does not require a person to be a sworn firefighter, although it is likely to be beneficial in terms of getting cooperation from property owners or occupants. If the inspector is not available to drive the battalion chief, the battalion chief drives himself. If the inspector is not available to act as incident safety officer, the incident commander designates another person to act in that capacity. In effect, fire suppression activity does not suffer if an inspector is otherwise engaged in inspection duties.

Three fire captains cost approximately \$250,000 annually. Three civilian inspectors with an annual salary of \$35,000 and benefits of \$8,635 would cost approximately \$131,000, a difference of \$119,000.

The ultimate impact of this option would be to reduce by one person per shift the capacity for sustained operations on any second simultaneous structure fire.

Labor relations issues would likely result from eliminating three senior positions from the IAFF membership and making them civilian positions.

This might be mitigated if the hiring protocols for this position gave preference to retired Covington firefighters.

This plan should be considered in the context of other alternatives selected for implementation. If other alternatives having a greater impact on fire suppression staffing are implemented, this option could be deferred pending the outcomes of those other alternatives. In other words, this option should be considered in lieu of the other alternatives, not in addition to.

Recommendation 21. Civilianize fire inspection positions if other staffing alternatives described above are not implemented.

Training

Fire training is under the direction of an assistant chief. Training topics and programs are developed and monitored centrally. Most training is accomplished at the company level, under the direction of company officers who implement the centrally developed programs. They also develop training topics that are pertinent to the company, based on the experience of the company personnel and observed field work in actual response situations. Training of at least one hour per company per shift is a normal part of each company's shift. Field training, where companies get a chance to work together, is also available on a periodic basis.

The training program is not as robust as we have seen in other career departments. Training tools and programs are not state-of-the-art. The upside is that command staff recognizes the need for improving the programs and tools available for training.

Recommendation 22. Develop a written training policy and monitoring protocol.

Technology

The Covington Fire Department has Firehouse software installed and uses it consistently and productively for all its record keeping and reporting purposes. We consistently found that whenever a request for information or data was made to the department, accurate results were forthcoming the following day.

Technology available for EMS and fire suppression activities are all state-of-the-art. Inspection and maintenance of all such tools are conducted on a daily basis at the beginning of each shift.

Conclusion

The Covington Fire Department's primary demand driver is emergency medical service with an average of over 26 runs per day. All types of fire runs, including mutual aid and false alarms, average just over eight per day. The Covington Fire Department responded to 58 actual building fires in 2011 of which six were mutual aid outside of Covington and seven were in vacant buildings. Service quality level for EMS consistently meets American Heart Association standards. By National Fire Protection Association Standards, fire suppression forces are understaffed. However, the vast majority of small departments like Covington do not meet NFPA standards for staffing.

The Fire Department command staff has done an outstanding job using the resources at its disposal to meet demand and provide high-quality service. Covington must deal with the challenge of its political boundaries being long and narrow. This geographic configuration when coupled with the terrain and road network, adds cost to fire protection and emergency medical services.

This report presents alternative staffing plans for Covington to consider should its financial condition require intensive cost-saving measures. If it becomes necessary, the options presented in this report will assist the City in assessing options for continuing to provide these vital services.

Community Development and Code Enforcement Organization Reviews

Background

The City of Covington, while challenged with difficult financial conditions, has a unique opportunity for redevelopment within the urban core and surrounding neighborhoods. The City's Ten-Point Action Plan provides direction to future development initiatives by bringing attention to key priorities for achieving growth, and articulates five areas that will influence improved community and economic development in the City.

- Building stronger public/private partnerships
- Thinking regionally with respect to service delivery
- Making it easier to do business with the City
- Forming a marketing team to help brand and market Covington
- Filling empty storefronts

The City Commission retained Management Partners to perform a review of the City departments responsible for community and economic development including the department of Community Development and the Department of Code Enforcement. It is appropriate to combine the analysis and recommendations of these two departments because of the complementary nature of planning, economic development, residential development, affordable housing, zoning, building and code enforcement functions.

Additionally, Management Partners factored in the role of the Housing Authority of Covington and the City's administration of the HUD Section 8 Program in addressing one segment of housing need within a larger context of carrying out planned redevelopment using a thoughtful and focused approach.

Methodology

Management Partners' methodology included conducting extensive interviews and gathering and analyzing data to develop a comprehensive understanding of the various City and non-City organizations and agencies that have a role in community and economic development functions. Management Partners conducted in-depth reviews of the two City departments, developed an understanding of efforts currently underway for redevelopment of the Covington Center City and a proposed public/private umbrella organization to promote and lead a program of planned residential and commercial projects and strategic investments.

To develop an understanding of the multiple entities involved in various aspects of housing and commercial redevelopment in Covington, Management Partners interviewed:

- Department directors
- Director of the Catalytic Development Funding Corporation of Northern Kentucky (CFDC)
- Executive director and president of the Housing Authority of Covington, and
- Progressive Urban Management Associates (PUMA) representatives, the City's planning consultant for the Center City redevelopment project

In addition to conducting one-on-one interviews, Management Partners reviewed regulations and codes, workflow data, performance standards and budgets, and assessed span of control unity of command as a part of our review.

The following operations review and recommendations derive from our knowledge of best practices and industry standards for planning and economic development, property maintenance and permitting functions. They incorporate the following principles used to guide our recommendations.

- The City government does not have the personnel and financial resources to develop the City; private/public partnership is essential.
- A great deal of time, effort and money has been invested in the PUMA Covington Center City Action Plan and that effort should be the point of departure.
- Housing development is an equally important partner to commercial development and must be an equal element of community development programming and investment.
- City resources should be used as gap fillers and leverage for development opportunities; private investment must lead the way.
- Covington should give preference for funding Urban Partnership staff and projects over staffing its own agency and programs.
- A robust business retention program must be an equal partner to new development.

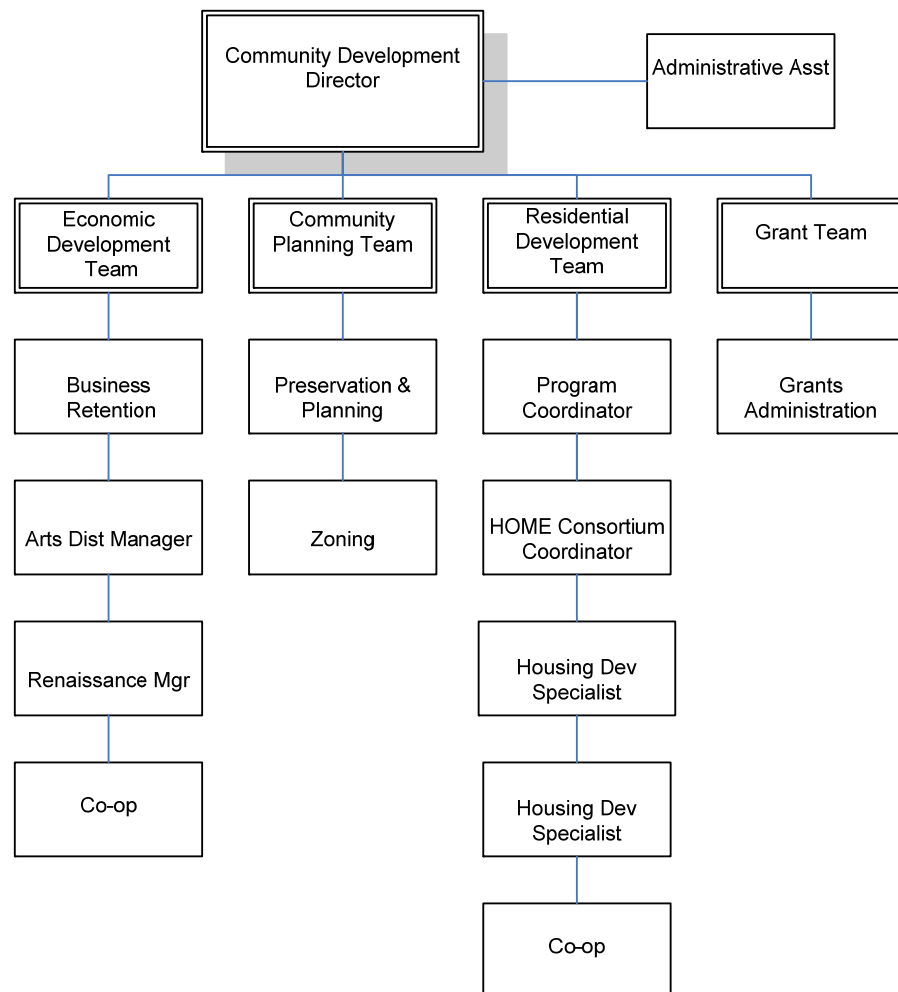
Community Development Department

Background

The Community Development Department is responsible for long range planning, short term action oriented planning, zoning, historic preservation, Community Development Block Grant (CDBG) and HOME Funds administration, residential development and economic development. The programmatic functions of the department revolve around revitalization of the urban core, business development and housing and neighborhoods.

The Community Development department is comprised of 12 full-time equivalent (FTE) professionals and supplemented by two cooperative education positions that support geographic information services (GIS) and economic development functions of the department. The current table of organization for the department is included as Figure 4.

Figure 4. Community Development Organization Chart



The approved 2011-12 All Funds budget for the Community Development Department is shown in Table 14.

Table 14. *Community Development All Funds Budget 2011-12*

Expense Category	Approved Budget
Economic Development	\$327,352
Zoning	\$94,349
Renaissance Program	\$71,734
Historic Preservation	\$83,000
Arts District	\$92,528
GF Subtotal	\$668,963
CDBG	\$2,118,707
HOME	\$688,167
HOME Consortium	\$346,524
HOME Match	\$92,886
Grand Total	\$3,915,247

The department's Annual Work Plan for 2012 articulates the duties and responsibilities for each of the four teams, and specifies local and regional partners required to carry out major revitalization strategies, such as the Covington Center City Action Plan (CCCAP) and other city-wide development initiatives.

Economic Development

The Economic Development Team is responsible for business retention, expansion, recruitment, and outreach efforts. Additionally, Economic Development Team staff members assist businesses in identifying funding resources. One staff member is devoted to supporting the efforts of the Renaissance Covington Board aimed at revitalizing Covington's historic downtown district by providing a point of contact for the distribution of information for the Commercial Rent Subsidy Program and the Upper Floor Rent Rehab Program. The Arts District Manager is responsible for promoting the City's Arts and Cultural district, and staffing an Arts District Steering Committee.

Other duties of the Economic Development Team include taking the lead on analyzing City-owned properties identifying potential disposition and redevelopment opportunities; remove barriers through the creation of a development handbook; establish a marketing team; and adopt incentives for business development in commercial storefronts.

Community Planning

The Community Planning Team is responsible for the development of short range action oriented plans and follow-up support for small area studies associated with development and implementation in priority areas of the City. Covington planners also work with staff of the departments of Public Improvements and Recreation to plan and implement public improvements.

Community planning staff also is responsible for administering the City's zoning code, which includes reviewing uses for compliance with the code, issuing permits, reviewing applications to the Board of Adjustment and reviewing zoning text and map changes and amendments. To support the work of the City's Barrier Removal Team, planning and zoning staff members are tasked with preparation of the development handbook.

The City of Covington has seven historic preservation overlay zones and 16 National Register Historic Districts. Some improvements within these areas require Certificates of Appropriateness (COA) and/or review by the City's Urban Design Review Board (UDRB). A planning and preservation specialist is responsible for administrative review associated with COAs and staffing of the UDRB.

Residential Development and Grants

The City of Covington receives federal funding in the form of CDBG and HOME entitlement funds to support community development projects and activities. Residential development staff members also administer HOME funds for a consortium of local municipalities including Bellevue, Newport, Ludlow, and Dayton, Kentucky.

Activities funded with 2011-12 CDBG and HOME funds include housing programs, economic development, public services and other programs, as summarized in Table 15. As illustrated in the table, the majority of federal funds are allocated toward housing activities designed to improve and stabilize Covington neighborhoods.

Table 15. *Covington/Northern Kentucky Consortium CDBG and HOME Expenditures*

Expenditure Category	Fund Source		Percent
	CDBG	HOME	
Housing			
Rehab/Repair	\$220,000		
Exterior Façade	\$80,000		
Homebuyer Assistance		\$631,275	
Development	\$50,000	\$343,908	
Sub-total Housing Expenditures	\$350,000	\$975,183	40.8%
Economic Development			
Small Business Recruitment	\$188,000		
Business Rental Subsidy	\$40,000		
Sub-total Economic Development Expenditures	\$228,000		7.0%
Public Services			
Police/Public Safety	\$200,000		
Recreation	\$32,000		
Sub-total Public Services Expenditures	\$232,000		7.1%
Public Improvement			
Streets, sidewalks, playgrounds	\$440,000		13.6%
Property Maintenance			
Code Enforcement	\$47,500		
Demolition	\$45,000		
Sub-total Property Maintenance Expenditures	\$92,500		2.8%
Other	\$776,207	\$152,394	28.6%
Total	\$2,118,707	\$1,127,577	

Staff members of the Housing Development Team have responsibility for connecting neighborhoods through collaborative planning and development initiatives such as Jackson Square and the CCCAP Action plan. Additionally, the Housing Development team addresses issues of neighborhood stabilization in conjunction with local non-profit development entities and the Housing Authority of Covington.

Code Enforcement Department

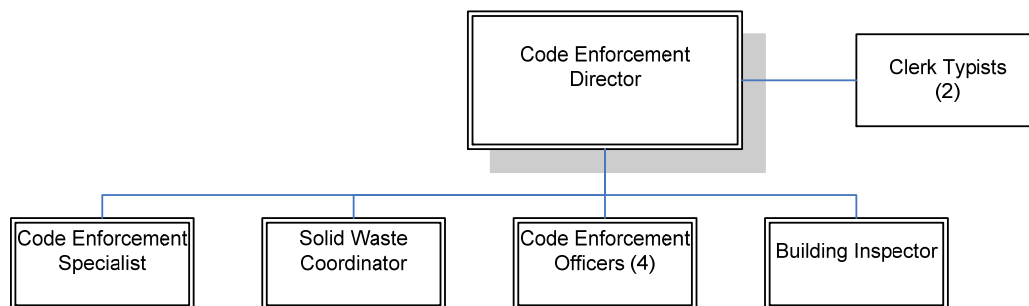
Code Enforcement Department employees are responsible for enforcing building and property maintenance codes and standards as well as issuing building permits and notices of violation and citations. The director staffs meetings of the Covington Code Enforcement Board and its bimonthly schedule reviewing property maintenance violations.

The goals of the department for 2011-12 include:

- Networking with other local jurisdictions to explore the possible interventions for addressing tenant conduct.
- Seeking solutions to speed up foreclosure sales on suits brought by the City of Covington.
- Meetings with rental property owners to discuss better collaboration, and working cooperatively with property owners and to promote efforts to address irresponsible owners.
- Form ad hoc committee of community organizations to meet regarding code enforcement policies, procedures, laws, and needs.

The current department organization is shown in Figure 5.

Figure 5. Current Code Enforcement Department Organization



The Code Enforcement General Fund budget for FY2011-12 totals \$3,085,509. A breakdown by expense category is included as Table 16.

Table 16. *Code Enforcement Department – General Fund Budget*

Expense Category	Approved Budget
Code Enforcement	\$890,640
Solid Waste Management	\$2,111,792
Building Inspection	\$83,077
Total	\$3,085,509

The code enforcement officers, code enforcement specialist and clerk typists carry out the day-to-day operations associated with responding to code enforcement complaints. Based on data provided by code enforcement staff, the volume of cases, which includes notices and violations, has decreased over the past three years, while the number remaining open is increasing.

Table 17. *Code Enforcement Data from 2009 to 2011*

	Total Cases	Cases Closed	Cases Open	Percent Open	Total Violations	Violations Closed	Violations Open	Percent Open
2011	4,400	3,968	432	9.82%	5,888	4,908	980	16.64%
2010	5,639	5,550	89	1.58%	7,748	7,497	251	3.24%
2009	4,985	4,980	5	0.10%	6,271	6,261	10	0.16%

Cases going to the Code Enforcement Board for the same three-year period are also decreasing. From 2009 to 2011 the number of cases heard by the Board decreased 45%.

The building inspector conducts plans reviews, as well as building and mechanical (HVAC) inspections for commercial and residential development activity and holds a Level II building inspector certification. Additionally, two code enforcement inspectors (Level II certified) conduct commercial and residential inspections and plans review as needed. The department also has one code enforcement officer with a Level I certification, which allows inspections of one- and two-family residential units.

Analysis and Recommendations

Recommended Organization Plan for Development Department

Management Partners' recommended organization plan combines Community Development, Code Enforcement Parks and Recreation, and Section 8 Administration under the leadership of the assistant city manager. Our recommendations are based, in part, in the reality that Covington does not possess the resources to solely implement the aggressive redevelopment initiatives set forth in the Covington Center City Redevelopment Plan.

City resources should be leveraged and fill the gap after non-public resources have been expended. The funding strategy going forward should be predicated on partnering to achieve the most efficient use of limited City resources.

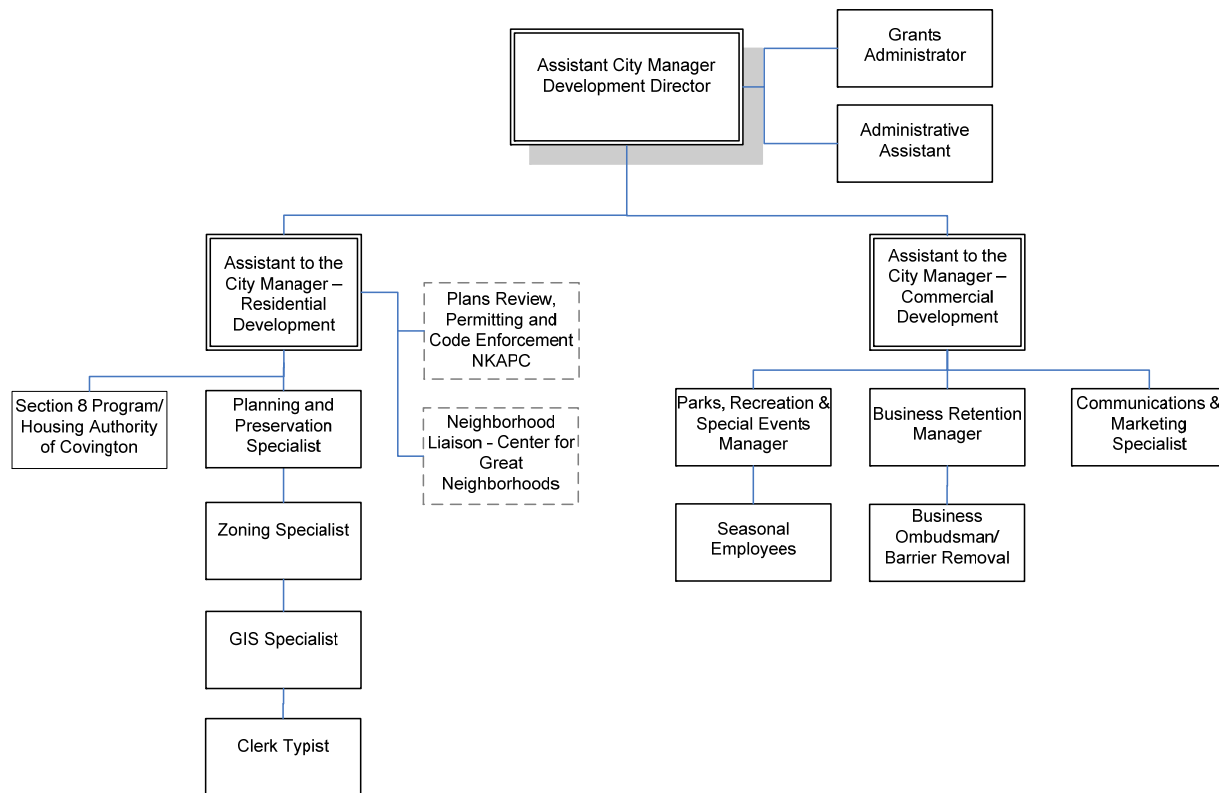
Management Partners has recommended an organization plan that promotes a unified approach to residential and commercial development, with the understanding that the City is one of multiple entities that will have a role in a public/private partnership for economic development detailed in the Covington Center City Action Plan.

As recommended, the reorganization of community development and code enforcement maximizes the resources devoted to residential redevelopment, business retention and commercial development by merging the functional responsibilities and taking advantage of economies of scale achieved by consolidating certain services on a broader scale than just with the City of Covington.

Recommended Department Organization Plan

Figure 6 shows the recommended organization and structure for the Covington Development of Development.

Figure 6. Recommended Development Department



The recommended Development Department consolidates functions of community development, Section 8 Administration, code enforcement, and parks and recreation into one department focused on land use, development, neighborhood livability carried out through programmatic emphasis on recreation and special events. The inclusion of the ombudsman position acknowledges and reinforces the relationship between business development and barrier removal associated with establishing streamlined and predictable review and approval processes. The responsibilities of the Development Department will be carried in two divisions: Residential Development, and Commercial Development.

Currently community development, Section 8 and code enforcement functions are organized and staffed as separate departments. While the programs of the departments are distinct, they are also complementary. Creating a consolidated department to address planning, economic and community development will allow for better coordination and leveraging of limited City resources.

Recommendation 23. Create a Department of Development directed by the assistant city manager.

The new department will foster a comprehensive approach to City development issues, inclusive of planning and code enforcement functions, residential and commercial development, parks and recreation, communications and marketing. Placing responsibility for development functions with a member of the City's senior management team also emphasizes the City's level of support to the proposed Urban Partnership required to implement the Covington Center City Action Plan.

Primary functions of the Development Department should address residential and commercial development, as well as planning/zoning and historic preservation responsibilities through an organizational structure that includes two divisions.

Recommendation 24. Appoint two assistants to the city manager who will have responsibility for the residential and commercial divisions of the department.

The assistant to the city manager for residential development will have responsibility for code enforcement/property maintenance, Section 8 administration, planning and preservation, zoning, geographic information systems (GIS), and liaison with NKAPC, and the Center for Great Neighborhoods.

The assistant to the city manager for commercial development will have responsibility for business retention, marketing and special events, parks and recreation, and barrier removal associated with commercial development and re-development projects.

In implementing this recommendation, the City may assign a more appropriate title for these positions than assistant to the city manager.

The assistant city manager will have oversight and management responsibilities for leading the Development Department. The position will establish direction for land use and zoning, development, preservation and stabilization of housing and neighborhoods, in addition to business retention, marketing, and the fostering of streamlined and transparent processes. To support the assistant city manager with day-to-

day management and operations of the department, administrative assistance will be needed.

Recommendation 25. Transfer the administrative assistant, formerly in Community Development, to the Development Department.

The emphasis on business retention and barrier removal will exert full-time demands on the ombudsman position. The ombudsman currently has duties as liaison with neighborhood and community groups. The Center for Great Neighborhoods is strategically positioned and willing to assume responsibility for such liaison functions. Transferring those duties to the Center for Great Neighborhoods will allow the ombudsman to focus on the strategically important functions of business retention and barrier removal.

Recommendation 26. Transfer existing community liaison functions carried out by the ombudsman to the Center for Great Neighborhoods.

Residential Development Division

This section of the report provides detailed information on the recommended operations and organization plan for the Residential Development Division of the Department of Community Development

Comprehensive Housing Strategy

The City's approach to preserving and enhancing an aging and historic residential housing stock includes stabilization efforts and down-payment assistance using CDBG and HOME funds, and enforcing property maintenance and nuisance codes. As federal entitlements used to support housing continue to decrease, a comprehensive strategy that will ensure efficient resource allocation and leveraging for the next three years is essential. Although the City is in the process of completing an aggressive economic development action plan for the Center City area, a complementary and citywide housing strategy is missing.

Recommendation 27. Develop a comprehensive housing strategy for Covington.

The strategy should address the City's role in new development, neighborhood stabilization through redevelopment initiatives and code enforcement, and identify focus areas that can be leveraged with private and

other public housing initiatives. In addition to outlining the use of City resources, the strategy should also acknowledge and incorporate the proposals of partnership entities, such as the Urban Partnership, CFDC, the Center for Great Neighborhoods, the Housing Authority of Covington and other entities that have a role in the housing development and revitalization projects. The CFDC has developed a real estate database for Covington and other Northern Kentucky jurisdictions that will allow a local stakeholder task force to prepare a strategy with City staff assistance.

Development Resources

This section of the report analyzes the organizational and financial resources that are important for housing development.

Federal Government Programs

Residential development functions are currently housed in the Community Development Department and include the administration of CDBG and HOME funds for Covington and a consortium of smaller cities, with Covington serving as administrator of the funds.

Based on information obtained from the director of Community Development, Covington's CDBG entitlement allocation for the 2012-2013 program year is projected to decrease an estimated 6%, from \$1,495,287 to \$1,404,381. However, more severe cuts for the HOME entitlement are projected, with funding to Covington dropping by 42%, from \$423,562 to \$244,458 in fiscal year 2012-13.

Although these entitlement grant programs are likely to continue to shrink they can be an important source of leverage and gap funding for specific development projects. While these sources must by law remain under Covington's control, the strategy should be to give priority for application of these resources to projects specified by the new Urban Partnership. To that end, the assistant city manager should work closely with the Urban Partnership on an annual basis to earmark these resources for support of Urban Partnership operations and projects within the constraints of federal requirements.

Recommendation 28. Develop a protocol for allocating federal entitlement grant funds in conjunction with the new Urban Partnership.

Other federal government housing resources include the HOPE VI categorical grant program and the Section 8 rental assistance program.

A prime development that will have significant impact on the long-term character and marketability of the City's housing stock and neighborhoods is the Housing Authority's River's Edge at Eastside Pointe. Redevelopment of the former Jacob Price housing site represents one of the largest new affordable housing projects in a decade or more. River's Edge is a Hope VI funded, mixed income housing development slated for construction in Covington's Eastside neighborhood.

Covington administers a substantial Section 8 rental assistance program for all jurisdictions in Kenton County. Although all of Kenton County is eligible to participate in the program, over 60% of the participants are in Covington. The objective of the Section 8 program is to de-concentrate low income families by making market rate rental housing affordable to them and to create missed income neighborhoods.

A critical factor to making the Section 8 program one that enhances rather than detracts from the community is the screening of tenants and landlords, vigorous and timely inspections of properties for code compliance, aggressive enforcement of program regulations on participants, and a "no strikes" protocol for violations. Currently, landlord and tenant screening and monitoring, and housing quality standards (HQS) inspections are overseen by the Housing Authority. There can be tension among these elements in program operations in that the federal government places strong emphasis on having vouchers in use for each month of the year. If a tenant or landlord is decertified or a unit fails HQS inspection it could result in a voucher not being used for a period of time. That would detract from HAC's performance evaluation by the federal government. Thus, there is a disincentive for HAC to be vigorous in landlord and tenant monitoring and HQS inspections.

As a measure of due diligence, Covington should prepare a request for proposals (RFP) for administration and operation of the Section 8 program. The RFP should emphasize and give great weight to the proposers' ability to provide robust screening of applicants and landlords, strong monitoring of tenants for compliance, and aggressive inspection of properties for code compliance. Since the federal government provides administrative fees attendant to the program it is possible that a vendor would be capable of providing the service for less than the fee paid by the federal program, leaving a portion of the fee income for other affordable housing programs.

Recommendation 29. Develop a request for proposals for providing Section 8 program administrative services.

The Hope VI and the Section 8 voucher program represent a departure from the old model of concentrating low-income residents to an approach that places greater emphasis on the creation of mixed-income neighborhoods and housing developments using a scattered sites approach. This strategy, while a best practice requires close coordination, and coordinated use of City and other resources to ensure that mixed income develops and housing in adjacent areas are maintained, thereby preserving stability and value. To achieve the desired coordination the Section 8 program administration and liaison with the Housing Authority of Covington should be organizationally located with the Residential Development Division.

Recommendation 30. Transfer the Section 8 program and staff to the Residential Division of the Development Department.

Revenue Bonds

One source of development resources that does not appear to be fully utilized is revenue bonds. These are debt instruments issued by the City that are backed by the revenue created by the development it finances. In today's constrained lending market revenue bonds have certain advantages. There is a broader market for these instruments than the commercial lending or mortgage markets. These long-term revenue streams are particularly attractive to insurance companies that must show long-term assets to balance long-term liabilities.

The City can bring down the cost of development by dispensing with the need for a project to secure a separate construction loan that is usually at a higher interest rate than long term financing. In addition, many commercial lending for large projects have a ten- to fifteen-year term while revenue bonds can have a longer term, thus bringing down debt service and making development more affordable.

Revenue bonds can also be used in conjunction with commercial lending as secondary financing. For a project with sound real estate fundamentals but tight cash flow at market lending rates, this could be the difference between approval and denial.

Recommendation 31. Develop a policy for the use of revenue bonds to support development.

It should be noted that revenue bonds do not have to apply strictly to residential development. Mixed use development can also apply. And in the realm of pure commercial development, industrial revenue bonds should be investigated.

Code Enforcement

As detailed above, the Code Enforcement Department has responsibility for enforcement of building, property maintenance and nuisance codes for all residential and commercial properties in the City. Responsibility for building inspections and plans reviews was transferred from NKAPC to Covington Code Enforcement staff in 2010, although NKAPC continued to retain jurisdiction for State level review and inspections as outlined in the Kentucky Building Code.

Data obtained from code enforcement indicate an average workload of one inspection per day. Clearly, the expense associated with a full-time Level II certified inspector exceeds the demand associated with this function. Similarly, the workload for code enforcement officers, based on data obtained from the department, averages four cases per day. Tables 18 through 20 include the average workload for building inspections and code violations inspections, as well as code enforcement cases.

Table 18. *Building Permits Issued during FY2011-12*

Type	Annual	Monthly Average	Weekly Average	Daily Average
Building	124	10.3	2.7	0.5
HVAC	95	7.9	2.1	0.4
Total				0.9

*Twelve-month average projected based on data from July 2011 to March 2012

Table 19. *Code Enforcement Cases and Inspector Workload*

Year	Workload	Average	Cases per Employee		
	Total Cases	Annual	Monthly	Weekly	Daily
2011	4,400	733	61	15	3
2010	5,639	940	78	19	4
2009	4,985	831	69	17	3

Table 20. *Code Enforcement Violations and Inspector Workload*

Year	Workload	Average	Violations per Employee		
	Total Violations	Annual	Monthly	Weekly	Daily
2011	5,888	981	82	20	4
2010	7,748	1291	108	26	5
2009	6,271	1045	87	21	4

Code Enforcement Improvements

An aggressive code enforcement program is essential to growth in an older central city such as Covington. No one wants to develop in a rundown area. While it is certainly commendable to approach code enforcement with a degree of empathy, it must be realized that when you work with owners or tenants who have failed to maintain their property you are abusing their neighbors who are being diligent about their responsibilities. Effective and fair code enforcement is consistent, predictable, and timely. These characteristics need to be embedded in Covington's code enforcement program.

The City of Covington has adopted the International Property Maintenance Code and local ordinances to direct enforcement activities. In most instances, property maintenance issues become formal code enforcement complaints based on a phone call from an individual or through proactive enforcement by a City inspector or another City employee. Once logged into Comcate, the complaint is assigned for inspection.

Upon inspection, the condition of the property is documented in Comcate and a photograph is taken and attached to the record. After documenting the conditions of the property, the inspector has the discretion to initiate informal contact with the property owner, issue a notice of violation and post the property, or issue a citation and post the property based on the type of violation.

The standard for compliance, by type of violation, ranges from five to 30 days for abatement. Management Partners found no written guidance to indicate which violations are subject to five days and those subject to 30 days. The standard operating procedures for the department specifies the following standards:

- Rubbish and debris on private property should be removed within five days;
- Weeds and grass exceeding 10 inches in height should be abated in five days if the property is occupied, or immediately if unoccupied;
- Junk vehicles should be removed within 10 days; and
- Vacant and unsecured property should be secured immediately (a maximum number of hours/days is not specified).

While code enforcement and property maintenance occurs in Covington, the process lacks consistency of enforcement due to vague and unwritten procedures, which result in an over-reliance on discretion by inspectors in applying the Property Maintenance Code. Best practices in the property maintenance and enforcement industry include comprehensive documentation of code standards for enforcement, regular proactive inspections of vacant properties and exterior conditions, regular inspections of rental properties, and targeted enforcement by neighborhood or area.

Recommendation 32. Review and rewrite standard operating procedures to establish a consistent approach to enforcement.

The operating procedures should detail the complaint process including time standards for notification and compliance, follow up inspection, citation and the process for appeal and request for hearing before the Covington Code Enforcement Board.

The average time for closing contested citations and notices of violation is unknown. A lack of protocols for granting additional time for compliance results in a protracted process and violations that continues for extended periods of time. In addition to the lack of protocols for closure, the Comcate system does not track the aging of violations and contested citations. Absent this feature, code enforcement inspectors lack an easy way to reduce compliance cycle times and prioritize enforcement.

Recommendation 33. Strengthen and codify enforcement actions to make citations automatic, thereby eliminating the violation notice.

This policy would bring consistency, transparency, and predictability to the code enforcement process. Violators who achieve compliance within the stipulated time period may be granted forgiveness of fines and penalties by the Code Enforcement Board.

To bring predictability to the code enforcement process Covington should adopt a protocol so that each neighborhood is inspected on a scheduled basis in addition to inspecting on a complaint basis. The cycle time for inspections should be such that each neighborhood would be inspected once a year.

Recommendation 34. Implement an annual property maintenance inspection cycle for Covington neighborhoods in addition to making inspections on a complaint basis.

Control of blight is a major concern for any city with an aging residential stock such as Covington's. New programs are needed to aggressively attack blight if Covington is to grow its population base and be an attractive place for people to live. Registration and inspection of rental properties on a systematic basis to maintain quality standards is an important new program. Similarly, a systematic approach to monitoring vacant structures for code compliance must be put in place to control neighborhood blight.

Elimination of blight from single family homes must also be provided for by a systematic program. The most effective method would be to provide an inspection on sale protocol that would bring properties into compliance when ownership is transferred – the best time to acquire funding for property improvements.

Recommendation 35. Implement programs for registering, inspecting and monitoring rental units, vacant structures and single family housing.

The new programs should be funded by a fee structure that will cover the cost of registration, inspection and monitoring.

These improvements to Covington's code enforcement protocols will place it on a path to enjoying significant improvements to the built environment of the City.

Plans Review and Code Enforcement Organization

This section of the report provides alternative organization plans for development reviews and code enforcement operations.

Plans Review Organization

NKAPC has a unified One Stop Shop that provides varying levels of plans review and inspection services based on the needs of the jurisdiction. NKAPC Level 1 services include building permit application processing, review and inspections, as well as zoning administration and staff support to the Covington Board of Adjustment. Application fees cover the costs associated with Level 1 One Stop services. As shown in Table 19 previously, the number of applications and permits made to Covington do not justify Covington providing this service when a cheaper, more user friendly service exists.

The rationale for bringing code enforcement and plans review back in-house was to give the City more direct control over the quality level of the service. But the cost inefficiencies of this approach stand out and augur for a reconsideration of that decision. Surely the City could negotiate quality control protocols with NKAPC that would enable it to monitor the level and quality of these services, thereby enabling the taxpayer to enjoy the cost savings from sharing service delivery as well as assuring City control over service quality.

Recommendation 36. Transfer responsibility for plans review and inspections to NKAPC.

Covington will retain zoning compliance reviews and zone changes as a City function. Covington residents will be able to use online services to submit applications and will be able to pick up their permits at Covington City Hall. Covington officials have indicated that a computer terminal could be provided at City Hall to assist applicants in submitting information for permits.

Code Enforcement Organization

Alternatives for continued enforcement of the City's property maintenance and nuisance codes allow for greater efficiencies in the enforcement of codes vital to improving and preserving the physical quality of Covington neighborhoods. Management Partners explored a number of options for enhancing code enforcement functions including implementing scheduled annual neighborhood property maintenance inspections.

One option calls for retaining the current complement of four property maintenance inspectors working two eight-hour shifts. Each inspector would work four hours a day, assigned to inspections based on a geographic area of either the northern or the southern part of the

Covington corporate limit. A full-time supervisor would assign and oversee the work of the part-time crews. This plan has been operating in Newport for some time and has proven to provide effective and efficient code enforcement.

A second option would be transferring property maintenance and code enforcement functions to the NKAPC. Transferring property maintenance and code enforcement, along with plan review and inspections would consolidate the functions with the NKAPC One Stop Shop. Advantages of consolidating all plans review and property maintenance functions with NAKPC include cost savings and efficiencies gained by utilizing a service model of a regional one-stop shop model that has been in existence since 2003. As such, NKAPC staff has developed a specialization in serving multiple jurisdictions in Kenton and Campbell County using a shared approach to staffing and technology. In addition to proactive enforcement, the NKAPC currently uses software for logging and tracking building permit applications and property maintenance data. An update of the system is planned and will allow for greater functionality of application tracking through the internet, allowing for greater transparency to citizens in review, inspection, and complaint processes. Full implementation of the new software system is scheduled for FY2013.

Table 21 summarizes costs associated with the first two options.

Table 21. *Code Enforcement Staffing Comparison – Part-Time and NKAPC Costs*

Part-time Staffing	
Personnel	
Supervisor	\$70,000
Part-time Inspectors (4)	\$47,715
Non-personnel	
Legal	\$12,000
Code Board	\$5,000
Court Costs	\$40,000
Other Contract	\$100,000
Motor Fuel	\$2,500
Total	\$277,215
NKAPC One Stop Shop	
Personnel	
Full-Time Inspectors (2)	\$149,200
Non-personnel	
Legal	\$12,000
Code Board	\$5,000
Court Costs	\$40,000
Other Contract	\$100,000
Total	\$306,200

Another option for code enforcement organization would be to form a consortium of jurisdictions in a variety of configurations to share services provided through a new single organizational entity. This concept would require detailed study including cost analysis and possible adoption of identical codes. Due to the innovative nature of this option cost analysis and detailed organization plan would not be appropriate subject matter for this report.

Yet another option for code enforcement organization would be to prepare a request for proposals to be used to determine the impact of securing a private vendor to provide the service, either to Covington alone or to a group of Northern Kentucky jurisdictions. This approach, if viable and implemented, would require a detailed plan for performance oversight or governance.

It is clear from our analysis that there are more economical ways to provide code enforcement service than the current organization used by Covington. Since each of these options would be superior to the current plan, Covington should review these alternatives and select an option that is appropriate to its environment and will result in an aggressive code enforcement program with the elements specified in this report.

Recommendation 37. Select an alternative organizational plan for implementing an aggressive code enforcement program.

Permit Intake and Issuance

The One Stop Shop is physically located in Fort Mitchell, Kentucky. Permit intake for all One Stop Shop applications, for jurisdictions served by NKAPC, occurs at the Fort Mitchell location. Although development review processing and approvals are recommended for transfer to NKAPC, customer service functions should remain in City Hall.

Recommendation 38. Locate intake of building permit applications and plans in the Residential Development division.

Applicants should have the option of plan drop off or pick up at either City Hall or NKAPC. The Zoning Specialist should be assigned to manage building permit intake at City Hall.

Two FTE clerk typists support current code enforcement functions. Clerk typists are responsible for answering complaints phoned in to the department and entering initial information pertaining to the complaint into Comcate. Clerk typists also assist with the issuance of administrative permits and code enforcement packets.

Recommendation 39. Reassign one FTE clerk typist to the Residential Division.

In addition to supporting code enforcement functions, the incumbent will also have responsibility for supporting Planning and Grants Division staff, and associated boards, including the Urban Design Review Board and the Board of Adjustment. The second clerk typist position should be eliminated.

The solid waste coordinator is responsible for managing the City's solid waste contract with CSI for residential and commercial refuse disposal and recycling. In addition to contract management, the position is

responsible for enforcing city nuisance and property maintenance codes pertaining to rubbish and garbage. While some functions of the position deal with inspections and the issuance of citations, solid waste coordination is more appropriately aligned with the services and operations of the Public Improvements Department.

Recommendation 40. Transfer the solid waste coordinator position to the Department of Public Improvements.

Housing Authority of Covington

The Housing Authority of Covington (HAC) owns and manages public housing units in the City of Covington. The Kenton County Section 8 program is managed by the City of Covington under the auspices of the executive director of the Housing Authority, functioning as a City employee.

As demonstrated by the new River's Edge at East Pointe mixed-income development, HAC can be a creative tool for residential development. The opportunities for HAC to contribute to the revitalization of Covington's residential stock should not be disregarded. Our research and interviews revealed a proclivity for the City and HAC to alternately hold one another at arm's length and then profess dismay about not forging stronger ties and mutual trust.

It is imperative that a close working relationship exist between the HAC and the City of Covington. Absent that relationship there will be a level of complexity, additional cycle time, misunderstanding, and potential for conflict to a development environment that requires greater simplicity, quicker and nimbler response capacity, unity of vision and partnership and trust. Given the upside value of HAC, and more importantly the negative potential for dissonance from HAC, the City must work to assure HAC's status as a partner and stakeholder in the development process.

Recommendation 41. Develop a strategy for forging a partner relationship between the City government and the Housing Authority of Covington.

If such a partnership cannot be forged in a timely fashion, the fallback plan would be for the Covington City Commission to assume the mantle of the HAC. The City attorney has indicated that this course of action is uncharted territory but has not indicated that it is contrary to statute.

Consequently, Covington should initiate the necessary research and planning to disband the HAC as currently constituted and have the City Commission become the HAC in the event that the desired close working relationship cannot be achieved.

Planning and Grants Organization

The reorganization of planning functions recognizes the need for long-range and area-specific plans to facilitate future residential and commercial developments. Similarly, zoning and historic preservation are necessary tools required to foster urban redevelopment and growth. The Community Development Department currently has two staff that are responsible for planning and zoning functions. The Planning and Preservation Specialist is responsible for tracking the activities of Small Area Study Committees that may be formed to assist in the implementation of area plans, historic preservation and staffing the City's Urban Design Review Board. A Zoning Specialist is responsible for zone changes, zoning compliance review and staffing the City's Board of Appeals.

Recommendation 42. Transfer the Planning and Preservation Specialist position to the Residential Development division.

Recommendation 43. Transfer the Zoning Specialist to the Residential Development division.

The grants administrator is responsible for preparation, monitoring and oversight of funds obtained through grants for community and economic development purposes. Specifically, the grants administrator is responsible for submission of the five-year Consolidated Plan and annual action plans, the HUD Challenge Grant, the Neighborhood Stabilization Program, Section 108 loan monitoring and EDA application support.

The grants administrator works in conjunction with CDBG and HOME program staff.

Based on data obtained from Community Development, Table 22 summarizes CDBG and HOME loan activity for FY 2011-12.

Table 22. CDBG and HOME Loan Activity for FY 2011-12

FY 2011-12 Program	Fund Total	Funds Committed	Funds Disbursed	Number of Loans Closed
CDBG Home Owner Rehab Loans - Core Area	\$35,000	\$17,000	0	0
CDBG Home Owner Rehab Loans - Latonia	\$35,000	0	0	0
Homeowner Repair - Citywide	\$50,000	\$10,000	\$31,200	3
CDBG Subtotal	\$120,000	\$27,000	\$31,200	3
Homebuyer Assistance - Latonia	\$87,500	\$15,000	\$73,134	
Homebuyer Façade Program - Latonia	\$45,000	\$45,000	\$1,330	15
Homebuyer Purchas Rehab - Latonia	\$100,000	\$0	\$15,000	1
Homebuyer Assistance - Core Area	\$87,500	\$16,791	\$0	1
Homebuyer Façade Program - Core Area	\$45,000	\$2,500	\$0	1
Homebuyer Purchase Rehab - Core Area	\$100,000	\$0	\$42,578	2
HOME Subtotal	\$465,000	\$79,291	\$132,042	20

The workload associated with CDBG and HOME loan funds totals fewer than three loans per month. While the focus of the program is targeted, the impact is minimal. Entitlement funds must be leveraged with private and foundation funds to make a difference in the built environment. Rather than allocating funds to programs, greater impact is achieved by using the City's entitlement funds as gap fillers and operational support for the proposed Urban Partnership.

Recommendation 44. Discontinue use of entitlement funds for categorical program purposes.

Recommendation 45. Assign all duties for CDBG and HOME administration to the grants administrator.

Consolidating federal grant activities with one staff person will free an estimated \$231,800 for other eligible activities.

Commercial Development Division

The Ten Point Plan specifies that the City will form a marketing team to help brand and market Covington. The responsibility for this element of the plan will reside in the Commercial Development Division.

We emphasize that a number of options should be considered in forming such a team and it might be best to actually use specialized contractors to design and execute the branding and marketing activities. Branding and

marketing are unique skill sets that may or may not be found in current employees. The assistant to the city manager for commercial development should work closely with the Urban Partnership to form the team and execute the strategy.

While the City will have an important role in the proposed Urban Partnership and implementation of the Covington Center City Action Plan, business development and retention outside of this key redevelopment area will continue as a core responsibility of the Development Department. In addition to working as a member of the Urban Partnership, City staff should complete and implement a strategy for removing barriers focused on streamlining City development review processes and establishing a communications portal for business retention and development and special events highlighting the City's local businesses. While the Urban Partnership is envisioned to have primary responsibility for special events, it is likely that the Neighborhoods, Parks and Recreation Department will coordinate City resources to support such events.

Recommendation 46. Transfer Neighborhoods, Parks and Recreation staff to the Commercial Development division and reclassify the positions.

The department is comprised of two full-time equivalent staff, a director and an assistant director. Both positions are included in the recommendation. The parks and recreation director position should be reclassified to the broader role of parks, recreation and special events manager. The new title reflects the addition of special events to support commercial development and revitalization responsibilities and focus. This position will also have responsibility for oversight of seasonal parks and recreation employees. Reclassifying the assistant recreation director position to a communication and marketing specialist will coordinate marketing of the City's commercial and arts districts in conjunction with the Urban Partnership and other private and non-profit entities.

Prior to initiation of Management Partners' review of community development functions, the assistant city manager began assessing the barriers to commercial and economic development and ways to reduce them. A primary goal resulting from the work of the barrier removal team is to create a development handbook, which will assist in streamlining current processes. Additionally, the role of the ombudsman will be critical to development applicants successfully securing approvals and permits and predictable processing of requests for development approvals and permissions.

An ombudsman is currently located in the City Manager's office. The ombudsman is responsible for working to address and resolve citizen complaints and acts as the liaison between Covington neighborhood groups and the City. In addition the ombudsman, the Center for Great Neighborhoods, a local non-profit organization dedicated to assisting Covington resident with capacity building, civic engagement and strengthening partnerships between neighborhoods, government, schools, and business, assists citizens and neighborhood groups.

Recommendation 47. Transfer the position of ombudsman from the City Manager's Office to the Development Department.

The ombudsman should report to the assistant to the city manager for commercial development and assist development applicants in the timely review of land use, public works, and architectural review regulations. It is a best practice to align the ombudsman with development responsibilities to assure that plans review and permitting processes function smoothly and without delay from pre-development and application to inspections and certificates of occupancy.

Conclusion

Combining functions of community development and code enforcement into a single department results in operational efficiencies, and allows for position savings that are required to address budget constraints in the upcoming fiscal year. Development operations will encompass two divisions: residential development and commercial development.

Covington and NKAPC resumes a contractual relationship for plans review, inspections, and issuance of building permits. Oversight of the Covington Housing Choice Voucher Program (Section 8) is transferred from the City Manager's Office to the Development Department, thereby creating a comprehensive planning and development team under the direction of the assistant city manager. The new Development Department also links the functions of Neighborhoods, Parks and Recreation as a necessary component of residential and commercial development.

Table 23. *Development Department Summary of Position Changes*

Department/Position/Action	FTE
Code Enforcement	
Current Positions	9
Positions After Reorganization	1
Community Development	
Current Positions	12
Positions After Reorganization	5
Transfers In	
Parks & Recreation Director	1
Assistant Recreation Director	1
Ombudsman	1
Transfers Out	
Solid Waste Coordinator	1
New Positions	
Assistant to the City Manager	2
Positions Reclassified	
GIS Intern to GIS Specialist	1

Management Partners' recommended community development and code enforcement consolidation through establishment of a Development Department results in net General Fund position savings estimated at \$475,414.

City Government Administrative Structure Review

Methodology

Management Partners reviewed the current organizational structure to discern the current reporting relationship of City departments to the City Manager. We interviewed the City Manager and City Commission members regarding management systems, communications, chain and unity of command, span of control, Commission agenda setting, responsiveness and other pertinent practices. We reviewed alternative organizational structures and analyzed the strengths and weaknesses of each. We also measured various organizational options against sound management theory and practice, such as span of control and unity of command.

We used a number of criteria to evaluate options. One important factor in our analysis was the suitability of the organizational plan for driving the various components of the ten-point plan forward to fruition. The ten-point plan is, in effect, the strategy identified by the Covington City Commission for achieving financial stability and sustainability for the municipal government. The ten-point plan is detailed below.

City of Covington Ten-Point Plan for Financial Stability and Sustainability

1. We will build a stronger public/private partnership.
2. We will conduct independent reviews of all areas of city operations.
3. We will get the three union contracts settled.
4. We will implement a zero based budget.
5. We will think regionally and consider shared services or privatization if there is a significant cost benefit.
6. We will get optimum value out of the city-owned properties to fund infrastructure.
7. We will make it easier to do business with the City.
8. We will form a marketing team to help brand and market CVG.
9. We will reduce our payroll tax rate.
10. We will enhance incentives to help fill our empty store fronts.

An economical structure and available skill sets are also factors employed in deciding a recommended organizational structure. It is likely that Covington will still face some personnel downsizing. Therefore, we attempted to develop an organizational structure that will minimize the impact of downsizing by using available skill sets wherever appropriate. However, when we judged it to be more important to organize a particular mission in a manner for which there are no readily apparent skill sets present, we chose to take the long-term view and recommend the optimal plan, even though it may mean recruiting individuals with new skills while simultaneously downsizing.

The overall organization structure recommended in this report is also based on the organization reviews of City departments carried out by Management Partners, including the Police, Fire, Community Development and Code Enforcement departments. When there was an appropriate nexus between our reviews of individual City departments and the overall organizational structure we proceeded on the assumption that the recommendations of our individual department reviews would be implemented.

This report does not repeat the detailed information or recommendations made in our individual organization reviews of City departments. It will be necessary to examine those individual department organization reviews to gain a full context and understanding of the overall organizational structure being recommended.

We reviewed our initial conclusions with the City Manager to avoid, as much as possible, making recommendations for an organizational structure that are diametrically opposed to other City government environmental factors that may have been unknown to us. As a result of that discussion no major impediments emerged. That is not to say the recommendations we are recommending will be easily accomplished. Courage and vision (the C and V of CVG) will be required to move the organization in the direction recommended.

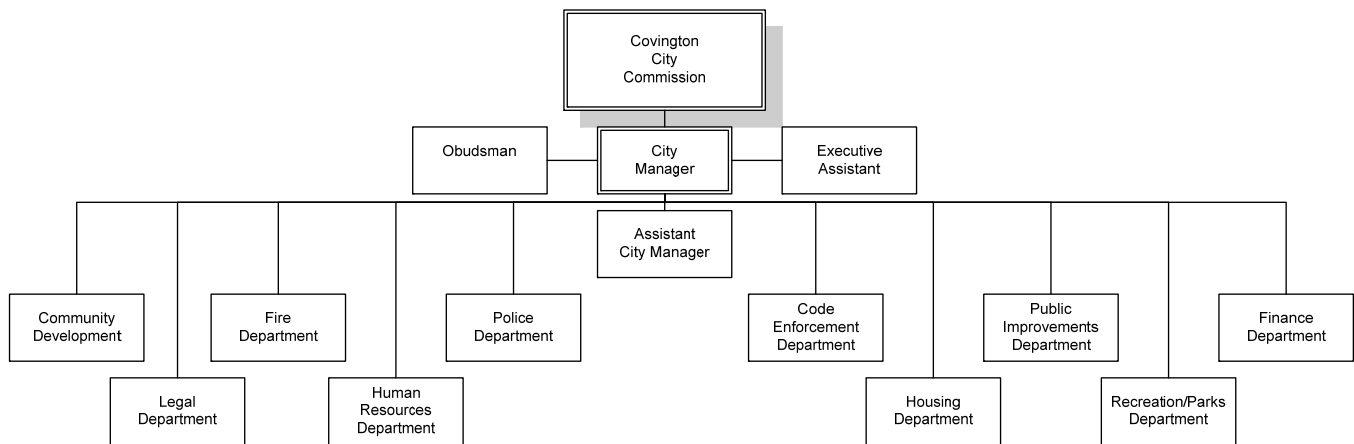
The overall organizational structure recommended in this plan involves some consolidation of currently separate agencies within the City government. Those consolidations will assist in reducing overhead costs and establishing unity of command with respect to the various missions of the City. This will make it easier to coordinate and focus the various activities of City government and should result in greater productivity from the resources Covington has at its disposal.

This section of the report also presents the outcome of our scan of the Department of Public Improvements (DPI). In 2008, Management Partners presented a report with 83 recommendations that resulted in consolidation of the then departments of Engineering, Public Works, and Parks, Recreation and Neighborhood Services. Follow-up interviews to that report indicated a universal satisfaction with the results of implementing the recommendations presented in the 2008 report. Consequently, it was concluded that another in depth organization review of that department would not be productive. However, it was determined that a scan of DPI operations by interviewing the director/city engineer would be warranted. The results of that interview are included.

Current Covington Organization Plan

Figure 7 shows the current organization chart for the City of Covington as explained by the City Manager.

Figure 7. City of Covington Current Organization Plan

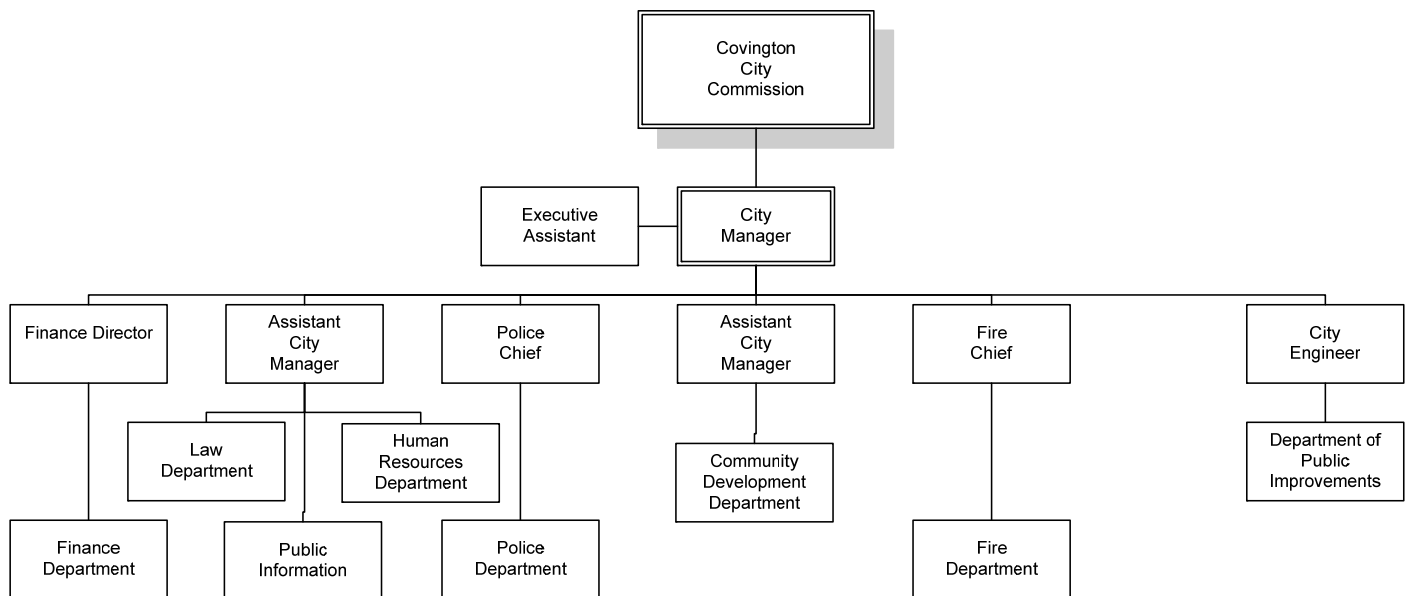


As shown, the City Manager has 13 direct reports. Sound management theory indicates that is almost twice as many direct reports compared with best practices regarding span of control.

Recommended Covington Organizational Plan

Figure 8 presents the recommended organization plan for the City of Covington.

Figure 8. City of Covington Recommended Organization Plan



The recommended organization plan reduces the number of direct reports to the City Manager from the current number of 13 to 7. The direct reports to the City Manager would be as follows:

- Assistant City Manager
- Police Chief
- Fire Chief
- City Engineer
- Assistant City Manager
- Finance Director
- Executive Assistant

Organizational Plan Rationale

This section of the report discusses the rationale supporting the recommended organizational structure. One of the conventions used in this section is that we have articulated which, if any, points in the ten-point plan would be the primary responsibility of the director of that agency. While achieving the objectives of the ten-point plan will require the effort of all City agencies, it is sound practice to assign responsibility for managing the total effort to a single individual in the organization.

Police and Fire Departments

The Police and Fire departments are the two largest organizations in terms of budget and personnel resources. They also have responsibility for public safety operations and will have front line responsibility in times of emergency. All of these factors indicate that the chiefs of these two departments should have immediate and direct access to the City Manager without being filtered through another tier of management.

The positions of police chief and fire chief remain unchanged in terms of current scope of responsibility.

Neither of these departments would have the lead responsibility for any of the ten-point plan.

Finance Department

The Finance Director is responsible for managing Covington's financial condition. Sound financial management means having a sustainable plan that looks at the near-term future and then manages the operations of the City in the context of that plan.

The City Manager and finance director must work as a team to constantly monitor the City's financial condition and to make operational adjustments as the financial status changes. The needed teamwork would be obstructed by imposing a tier of management between the City Manager and the finance director.

Compared to the current scope of responsibility, the finance director would be assigned responsibility for the following two objectives of the ten-point plan.

Ten-Point Plan Responsibilities

- We will implement a zero based budget.

- We will reduce our payroll tax rate.

City Engineer

The city engineer is currently responsible for the Department of Public Improvements which manages and maintains the built infrastructure of Covington, including right-of-way improvements and City facilities, such as parks and recreation facilities.

The position of city engineer remains unchanged in terms of current scope of responsibility.

We do not recommend that the city engineer take lead responsibility for any elements of the ten-point plan.

Executive Assistant

The executive assistant provides daily assistance directly to the City Manager on a number of administrative issues. Efficient functioning for this position also requires direct access to the City Manager.

The executive assistant duties remain unchanged in terms of current scope of responsibility.

We do not recommend that this position take lead responsibility for any elements of the ten-point plan.

Organizational Restructuring

The recommended organizational structure as it impacts the city attorney, and assistant city manager takes into account changes recommended by organization reviews carried out in other departments or in this analysis of overall organizational structure.

Assistant City Manager (Administration)

The recommended organizational plan removes the human resources director as a direct report to the City Manager and places that position under the direction of an Assistant City Manager. The imperative is to reduce the number of direct reports to the City Manager. Human resource departments in municipal government are very much driven by the rule of law, regulations, and labor agreements. Most human resource activities cross paths with a city's legal arm on a regular basis. Since it is necessary to reduce the number of direct reports to the City Manager, an

alternative fit is for human resource activities to be placed under an Assistant City Manager who also is responsible for the Law Department.

Recommendation 48. Delegate responsibility for human resource activities to an Assistant City Manager.

Recommendation 49. Place the human resources director in a direct reporting relationship to an Assistant City Manager.

This Assistant City Manager should be assigned lead responsibility for real estate management of City assets. Some assets are currently leased, some assets should be sold and some assets should be configured for redevelopment.

This Assistant City Manager would also serve as the City's public information officer. Most government jurisdictions have designated a specific position as the media contact point. Designating this position with that responsibility will unify media relations for the City of Covington.

Recommendation 50. Assign public information officer responsibility to an Assistant City Manager.

This Assistant City Manager would be responsible for the following ten-point plan item.

Ten-Point Plan Responsibility

- We will get optimum value out of the City-owned properties to fund infrastructure.

Assistant City Manager (Development)

As detailed in the organization review report on Community Development, Housing and Code Enforcement, for Covington to achieve the concepts set forth in the adopted ten-point plan for financial stability, the economic development efforts of the City must be reorganized. This reorganization must be focused, include private sector partners crucial to growth and development, and include both housing and business/jobs development. On its own, the City government cannot mount an effort that has the needed staff and financial resources to be effective at growth and sustainability.

Among other actions, in the organization review of the City's Community Development, Housing and Code Enforcement, and Parks and Recreation

agencies (all of which are currently separate departments) Management Partners recommends they be consolidated and reorganized. The City needs a senior manager position that is dedicated full-time to directing, leading and managing the City's development and growth activities.

The position of assistant city manager is best positioned to assume the responsibility for those development efforts. In that context, the position of ombudsman is logically placed at the disposal of the assistant city manager rather than reporting to the City Manager. Many business development and/or retention details and issues can be directed to the ombudsman position.

Recommendation 51. Consolidate Covington's Community Development, Code Enforcement and Housing, and Parks and Recreation agencies into a single Department of City Development as recommended more specifically in the organization review of those agencies.

Recommendation 52. Assign responsibility for City Development activities, including building and maintaining relationships with the City's development partners, to the assistant city manager.

Recreation, Parks and Neighborhood Services Department

The Recreation, Parks and Neighborhood Services Department provides the programming and programming support for Covington's park and recreation facilities. There are currently three full-time positions in that department. The functions of this agency are recommended to be fully incorporated into the reorganized Department of Community Development. The objective is to incorporate the business and residential development value of park assets and recreation programs into the program for business retention and new residential and commercial development. This strategy can be accommodated while still providing the services and programs that have historically been offered by the agency.

The ten-point plan calls for the development of a marketing team to brand and market Covington. The current department director has developed a substantial approach for such an effort. And, the parks and recreation assets of the City would be a significant element of a branding and marketing program. The branding and marketing program must be directly coordinated with the other community development efforts assigned to the assistant city manager.

Recommendation 53. Incorporate the Recreation, Parks and Neighborhood Services Department functions into the reorganized Department of Community Development as recommended in the report on that department.

The assistant city manager would be responsible for a number of the objectives of the ten-point plan as enumerated below.

Ten-Point Plan Responsibilities

- We will build a stronger public/private partnership.
- We will make it easier to do business with the City.
- We will form a marketing team to help brand and market Covington.
- We will enhance incentives to help fill our vacant storefronts.

Other Ten Point Plan Assignments

Seven of the points of the ten-point plan are assigned in the recommended organizational structure. The three remaining points must be reserved for the City Manager to act as lead. Those points are as follows:

- We will conduct an independent review of all areas of City operations.
- We will get the three union contracts settled.
- We will think regionally and consider service sharing or privatization if there is a significant cost benefit.

As the chief executive officer of Covington, the City Manager must lead the independent organizational review effort. It is not appropriate for a department take the lead on such reviews since that would compromise the independent factor of the review. The Mayor and City Commission members are not full-time positions and are not appropriate to conduct the reviews. At the time this report was being written, private funding for the reviews has allowed four of them to begin and reach a stage of substantial completion.

Just prior to the completion of this report, the City reached five-year labor agreements with all three City unions. Thus, this objective of the ten-point plan has been achieved.

Developing regional approaches such as service sharing will require significant work with agencies and jurisdictions external to Covington.

The City Manager, with the assistance of Covington's elected officials, must be the driving force moving such ideas forward.

Covington is the largest city in Northern Kentucky in terms of population and is likely to have the most to gain from service sharing, although real service sharing inures to the benefit of all, especially residents. Service sharing and regionalization is a difficult and long process. Without the leadership of the Covington City Government, it is longer and more difficult.

Recommendation 54. Develop an agenda, process and timetable for generating opportunities for regionalization and service sharing in Northern Kentucky.

Management System

Organization structure is an important element of effective and efficient management of the municipal enterprise. However, if a sound structure does not have an embedded management system that facilitates operations the outcomes will be less than optimal. This section sets forth the elements of a recommended management system to be implemented by Covington City government.

Recommended Management System

Strategic Plans

The primary products and services of the City should be driven by a strategic plan. The strategic plan would encompass a multi-year analysis of demand for the product/service, an analysis of demand drivers and trends; an analysis of resources (money, personnel, partners, etc.) needed to meet the projected demand, a multi-year operations plan and other plan elements related to the specific product or service.

Programs and Projects

Municipal operations can be divided into two types of activities: programs and projects. Programs are the products and services that a city agency provides on a daily basis for public consumption and use. Examples of programs include snow removal, parks maintenance, response to emergency service calls, and property maintenance code enforcement among many others.

Projects are specific activities designed to implement a new activity or make a physical improvement to an asset. Examples of projects would include rehabilitating the Highway Avenue flood gate, Martin Luther King Jr. roadway improvements, selecting a developer for City-owned property at Fifth and Main, and implementing a new records management system in the Police Department. Projects are characterized by having a specifically stated outcome, a beginning and ending date, an

identified budget, a designated manager and timely progress monitoring and reporting.

Program Performance Measures and Standards

The ongoing activities of a municipal jurisdiction, programs, usually consume the largest amount of resources. A requisite factor for high performance management of municipal programs is that there is an articulation of what success looks like for each program. For example, success for the property maintenance code enforcement program could be described as: "Correction of 80% of code violations within 30 days of initial inspection."

Identifying and stating the success profile for a program allows all stakeholders to understand what the program is meant to accomplish. This is especially crucial for employees working in the program. Without an articulated statement of a success profile it would be difficult know when success has been achieved. Note that the success statement defines not only the measurement of success, correction of code violations, it also sets the performance standard of 80% corrected within 30 days of initial inspection.

Performance Monitoring and Reporting

Unless there is systematic monitoring and reporting of program performance and project progress, continuous improvement is left to chance. The most basic purpose for monitoring and reporting is to make adjustments to operations, resource allocation, policies and procedures when sub-standard performance becomes evident.

High performance management demands agility and timeliness in making adjustments when conditions change or when efforts do not reach target. The most effective monitoring and reporting systems tie to the budget process. While budgets are being prepared and performance measures and standards are being agreed upon in the context of resource allocations, the cycle for monitoring and reporting should be established.

The monitoring and reporting cycle should not be a cookie cutter matrix but rather tailored to the success profile for the program or project. Some programs, such as the code enforcement example cited above might be monitored and reported on a 30-day basis since that timeframe is an element of the performance standard of success. For projects, the monitoring and reporting cycle should be tied to the milestones in the project calendar.

The important point is that each program and project should have the monitoring and reporting cycle established upon approval of the resource allocation for the program or project. That allocation approval usually occurs during the budget process.

Reporting on programs and projects should be formatted so that it is usable for differing groups of stakeholders. City Commission members may receive reports on groups of programs or projects on a quarterly cycle, while the City Manager may get the same report on a monthly cycle. Employees may get reports on a weekly basis about their programs while customers/external stakeholders may receive an annual report.

There is no prescription for an ideal reporting cycle. An appropriate reporting cycle and format is a function of the substance and circumstance of the projects and programs. Programs and projects that are high profile/heavily resourced may demand more frequent and in depth reporting than those that are lower profile/lower resources programs and projects.

Annual Work Plan

After the budget is approved, an annual work plan for each department that provides detailed information regarding programs and projects for the year. For each program and project, the work plan would spell out the resources allocated, person responsible for program operations and team members, the success profile in terms of targeted performance measures and standards, actions steps and associated timing/target dates, and monitoring/reporting cycles.

Employee/Team Performance Reviews

In addition to monitoring program performance on a scheduled basis, it is also necessary to monitor and evaluate the performance of personnel assigned to specific duties and tasks in the context of programs and projects. This evaluation should be done twice a year. Performance evaluation should be heavily oriented to program/project success factors. These evaluations should also include some elements that speak to team work and relationships with other City staff.

Table 24 summarizes the elements of a recommended management system.

Table 24. *Recommended Management System*

System Element	Annual Completion Target
Review and evaluate program performance data and establish continuous improvement goals	30 days prior to beginning of budget process
Conduct annual strengths, weaknesses, opportunities, threats (SWOT) analysis	30 days prior to beginning of budget process
Update strategic plan	30 days prior to beginning of budget process
Project employee turnover and develop replacement strategy	30 days prior to beginning of budget process
Develop inventory of projects to be initiated/completed in the next budget cycle	30 days prior to beginning of budget process
Develop operating and capital budget requests and presentation based on above system elements	By date of budget hearing with City Manager
Develop annual work plan	One week following budget approval
Update program performance standards and continuous improvement goals	One week following budget approval
Update position success profiles	One week following budget approval
Communicate annual work plan and updated position success profiles to all department employees	Two weeks following budget approval
Communicate updated program performance standards and continuous improvement goals to all department employees	Two weeks following budget approval
Collect program performance data, evaluate program performance and report on outcomes to stakeholders: employees, customers, City administration, elected officials, industry peers	Continuous throughout the year on monthly, quarterly, semi-annual, annual basis
Review progress on projects/goals	Monthly throughout the year
Conduct employee/team performance reviews	Quarterly
Prepare written annual report	30 days prior to beginning budget process

Recommendation 55. Institute and implement a management system for all Covington departments.

Department of Public Improvements Scan

In 2008 Management Partners presented a report that made 83 recommendations pursuant to organization reviews of the departments of Engineering, Public Works, and Parks, Recreation and Neighborhood Services. As a result, those three agencies were consolidated into a single Department of Public Improvements (which has been in existence since August of 2008).

Our scan of the current status of DPI indicates that nearly all of the 83 recommendations made in the study have been implemented and many have been improved upon through the efforts of the staff. Some notable examples that have resulted from the 2008 report and the continuous improvement efforts of the department staff include:

- A vendor has been engaged to be the parts supplier and shop operator, resulting in a 20% to 30% savings on parts.
- The fleet maintenance organization provides services to other jurisdictions, which generates approximately \$30,000 in revenue for the City.
- Unit costs on street cleaning are now known and compare favorably to private vendor cost.
- Spent oil is used to provide heat at the fleet facility resulting in elimination of heating costs.
- New software has been installed that allows productivity of all aspects of operations to be tracked and compared historically.
- Parking enforcement has been outsourced resulting in net revenue gains to the City and better transparency to the public.
- Animal control service is now provided by Kenton County.

The following observations and recommendation result from our scan of DPI.

Observations and Recommendations

Assistant City Engineer

As a result of the overall administrative structure review it is likely that the assistant city engineer will have new duties and/or a new position. If the overall financial strategy of Covington is successful in its aim to allocate a more appropriate level of funding for infrastructure maintenance and improvements it will be necessary to have someone with engineering skills and qualifications to lead that effort. Therefore, if the current assistant city engineer assumes different responsibilities within the organization it is important to replace those skills.

Devou Park

Devou Park is a regional park located in Covington. Currently, park expenses are met through Covington's General Fund revenue and revenue raised by the operation of the Drees Center and deposited in trust funds for the park. Nearly \$2,000,000 of infrastructure assets, such as roads and path, are the sole responsibility of Covington.

The Hamilton County (Ohio) Park District operates a number of regional parks similar to Devou and funds its operations partially by charging an entrance fee for automobiles entering the park.

There may be deed restrictions on Devou Park that has constrained the use of this property to its current park purpose and ownership. Management Partners heard anecdotal commentary that there are no alternatives to the current situation, but the scope of our work did not allow for a legal search and analysis to verify and validate those comments.

Therefore, the question arises: What if Covington could no longer afford to maintain this facility? What could be done in such a case? It is possible that the Devou heirs could and would be willing to negotiate new restrictions that would more appropriately align to the functioning of the park now.

Recommendation 56. Investigate the feasibility of transforming Devou Park into a regional facility under the auspices of Kenton County with financing from a regional base.

Solid Waste Contract

In the Community Development Department section of the report, Recommendation 43 is to transfer administration and coordination of the solid waste vendor's contract from the code enforcement agency to DPI. Much of the monitoring of vendor performance occurs at the Boron Avenue transfer station, which is also the site of DPI headquarters. Much of the monitoring at the transfer station is assuring that there is no illegal material included in the solid waste being transferred.

The original placement of the solid waste coordinator position was included in the code enforcement agency with the thought that most of the activity would be focused on litter enforcement activity. While litter enforcement is important, it has become apparent that monitoring at the transfer station consumes a large amount of the coordinator's time. In addition, the City engineer believes there is a likelihood that rearranging duties among DPI staff based at headquarters and the solid waste coordinator can produce better coverage for transfer station monitoring while also providing more resources for litter enforcement. Finally, the recommendation for outsourcing code enforcement to the NKAPC would leave the position of solid waste coordinator as an "orphan" type position that does not fit neatly into the organizational scheme of the Residential Development Division of the Community Development Department.

Recommendation 57. Transfer responsibility for monitoring solid waste activities to the Department of Public Improvements.

Conclusion

Covington is conducting organization reviews of a number of its agencies. One of the elements of those reviews is to measure the viability of the current overall organizational structure against standards of sound management practice, the ten-point plan, economy of operations, and the recommendations resulting from the reviews of individual departments. This report presents the results of the analysis.

The recommended organization plan reduces the number of direct reports to the City Manager from 13 to 7, implements an organizational structure that can drive the ten-point plan, maximizes the skill sets of current employees, and supports the recommendations of individual department reviews.

Attachment A – List of Recommendations

- Recommendation 1.** Reorganize the command and management structure of the department to eliminate the rank of captain and create an additional assistant chief position.
- Recommendation 2.** Implement the CompStat policing model.
- Recommendation 3.** Close Covington’s E-911 Center and transfer surplus hardware and software to Kenton County.
- Recommendation 4.** Receive future E-911 service from Kenton County.
- Recommendation 5.** Transfer personnel from third shift to second shift to adjust for seasonal changes in demand.
- Recommendation 6.** Implement a differential response protocol for 911 calls for service.
- Recommendation 7.** Eliminate the sergeant’s position in the records section.
- Recommendation 8.** Hire part-time clerical positions with the savings from the records sergeant to eliminate records backlogs and support a telephone reporting system.
- Recommendation 9.** Continue the school resource officer, housing authority, and DEA and FBI Task Force special units so long as appropriate external funding is forthcoming.
- Recommendation 10.** Disband the Community Outreach program and incorporate the program mission statement and programs into the Patrol Bureau.
- Recommendation 11.** Transfer personnel assigned to the Community Outreach unit to the Patrol Bureau.
- Recommendation 12.** Reclassify the sergeant position in the Community Outreach unit to police officer.
- Recommendation 13.** Adopt a command staff code of behavior and implement the principles aggressively.
- Recommendation 14.** Prepare a request for proposal for third-party vendor emergency medical services based on the current service quality level provided by the Covington Fire Department.
- Recommendation 15.** Analyze proposals received for potential cost, benefits and issues.
- Recommendation 16.** Pursue EMS Alternative A first, then compare the economic benefit and service quality level of fire suppression of that Alternative to Alternative B.
- Recommendation 17.** Eliminate daily staffing of the quint located at Station 8 if cost reductions in fire suppression staffing are necessary.
- Recommendation 18.** Initiate discussions of regional fire and EMS among Northern Kentucky officials.
- Recommendation 19.** Privatize EMS and eliminate daily quint staffing if dictated by Covington’s financial condition.
- Recommendation 20.** Replace stations 1 and 2 with a new station to the north of current station 1.

- Recommendation 21.** Civilianize fire inspection positions if other staffing alternatives described above are not implemented.
- Recommendation 22.** Develop a written training policy and monitoring protocol.
- Recommendation 23.** Create a Department of Development directed by the assistant city manager.
- Recommendation 24.** Appoint two assistants to the city manager who will have responsibility for the residential and commercial divisions of the department.
- Recommendation 25.** Transfer the administrative assistant, formerly in Community Development, to the Development Department.
- Recommendation 26.** Transfer existing community liaison functions carried out by the ombudsman to the Center for Great Neighborhoods.
- Recommendation 27.** Develop a comprehensive housing strategy for Covington.
- Recommendation 28.** Develop a protocol for allocating federal entitlement grant funds in conjunction with the new Urban Partnership.
- Recommendation 29.** Develop a request for proposals for providing Section 8 program administrative services.
- Recommendation 30.** Transfer the Section 8 program and staff to the Residential Division of the Development Department.
- Recommendation 31.** Develop a policy for the use of revenue bonds to support development.
- Recommendation 32.** Review and rewrite standard operating procedures to establish a consistent approach to enforcement.
- Recommendation 33.** Strengthen and codify enforcement actions to make citations automatic, thereby eliminating the violation notice.
- Recommendation 34.** Implement an annual property maintenance inspection cycle for Covington neighborhoods in addition to making inspections on a complaint basis.
- Recommendation 35.** Implement programs for registering, inspecting and monitoring rental units, vacant structures and single family housing.
- Recommendation 36.** Transfer responsibility for plans review and inspections to NKAPC.
- Recommendation 37.** Select an alternative organizational plan for implementing an aggressive code enforcement program.
- Recommendation 38.** Locate intake of building permit applications and plans in the Residential Development division.
- Recommendation 39.** Reassign one FTE clerk typist to the Residential Division.
- Recommendation 40.** Transfer the solid waste coordinator position to the Department of Public Improvements.
- Recommendation 41.** Develop a strategy for forging a partner relationship between the City government and the Housing Authority of Covington.

Recommendation 42. Transfer the Planning and Preservation Specialist position to the Residential Development division.

Recommendation 43. Transfer the Zoning Specialist to the Residential Development division.

Recommendation 44. Discontinue use of entitlement funds for categorical program purposes.

Recommendation 45. Assign all duties for CDBG and HOME administration to the grants administrator.

Recommendation 46. Transfer Neighborhoods, Parks and Recreation staff to the Commercial Development division and reclassify the positions.

Recommendation 47. Transfer the position of ombudsman from the City Manager's Office to the Development Department.

Recommendation 48. Delegate responsibility for human resource activities to an Assistant City Manager.

Recommendation 49. Place the human resources director in a direct reporting relationship to an Assistant City Manager.

Recommendation 50. Assign public information officer responsibility to an Assistant City Manager.

Recommendation 51. Consolidate Covington's Community Development, Code Enforcement and Housing, and Parks and Recreation agencies into a single Department of City Development as recommended more specifically in the organization review of those agencies.

Recommendation 52. Assign responsibility for City Development activities, including building and maintaining relationships with the City's development partners, to the assistant city manager.

Recommendation 53. Incorporate the Recreation, Parks and Neighborhood Services Department functions into the reorganized Department of Community Development as recommended in the report on that department.

Recommendation 54. Develop an agenda, process and timetable for generating opportunities for regionalization and service sharing in Northern Kentucky.

Recommendation 55. Institute and implement a management system for all Covington departments.

Recommendation 56. Investigate the feasibility of transforming Devou Park into a regional facility under the auspices of Kenton County with financing from a regional base.

Recommendation 57. Transfer responsibility for monitoring solid waste activities to the Department of Public Improvements.

Attachment B – Employee Survey and Focus Group Results

Introduction

An important step in learning about the Covington Police Department is taking the pulse of the organization by assessing the levels of concern sworn and non-sworn employees have about department operations. In conjunction with interviews of command staff, Management Partners distributed an electronic employee survey to gather information from employees throughout the department.

An electronic survey, accessible using an internet log in, allowed employees the opportunity to respond to survey questions in four categories: productivity, culture, safety and health, and communication. Although individual responses were anonymous, aggregated survey comments allowed for the identification of common themes. The survey included 68 statements that respondents were asked to indicate levels of agreement, disagreement or no opinion using a five-level Likert scale of responses: strongly agree, agree, disagree, strongly disagree, and don't know.

A 66 percent completion rate indicates a high willingness among Covington Police officers and employees to offer suggestion and input into the operations review. The majority (59.7%) of survey respondents were patrol officers. Table 26 includes other respondent descriptors.

Table 25. *Covington Police Survey Respondents*

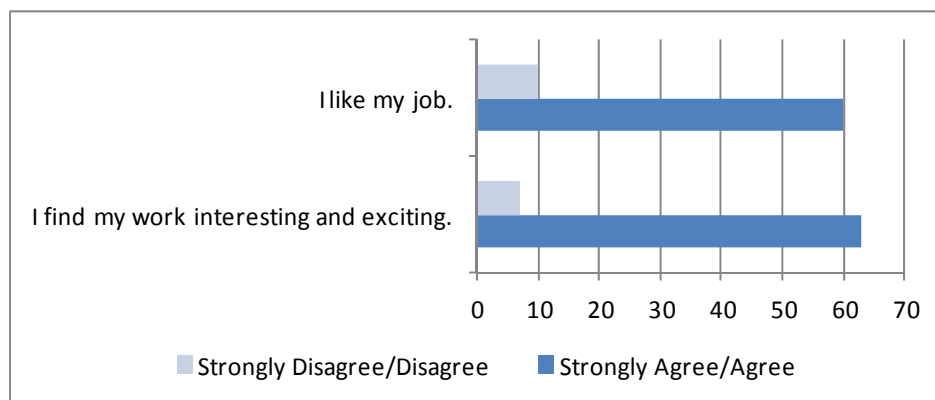
Descriptor/Category	Percentage
Length of Service	
1 to 5 years	21.7%
5 to 10 years	29.0%
10 to 15 years	13.0%
15 to 20 years	26.1%
20 to 25 years	10.1%
Position	
Patrol Officer	59.7%
Command Staff	13.4%
Administration	6.0%
Civilian	9.0%
Chief (in position title)	1.5%
Other	19.4%
Sworn/Civilian	
Sworn	89.9%
Civilian	10.1%

In addition to the employee survey, Management Partners held three focus groups. The focus groups attendees included officers and civilian employees who did not complete the electronic survey, as well as individuals who wanted the opportunity to make their comments within the context of an employee group. Focus groups were comprised of employees from the bureaus of Patrol, Special Operation, the Crime Lab and Records.

Productivity

Thirteen questions related to various elements of job performance and working relationships comprised this section of the survey. Figures 19 through 21 indicate areas of agreement, disagreement and neutral response.

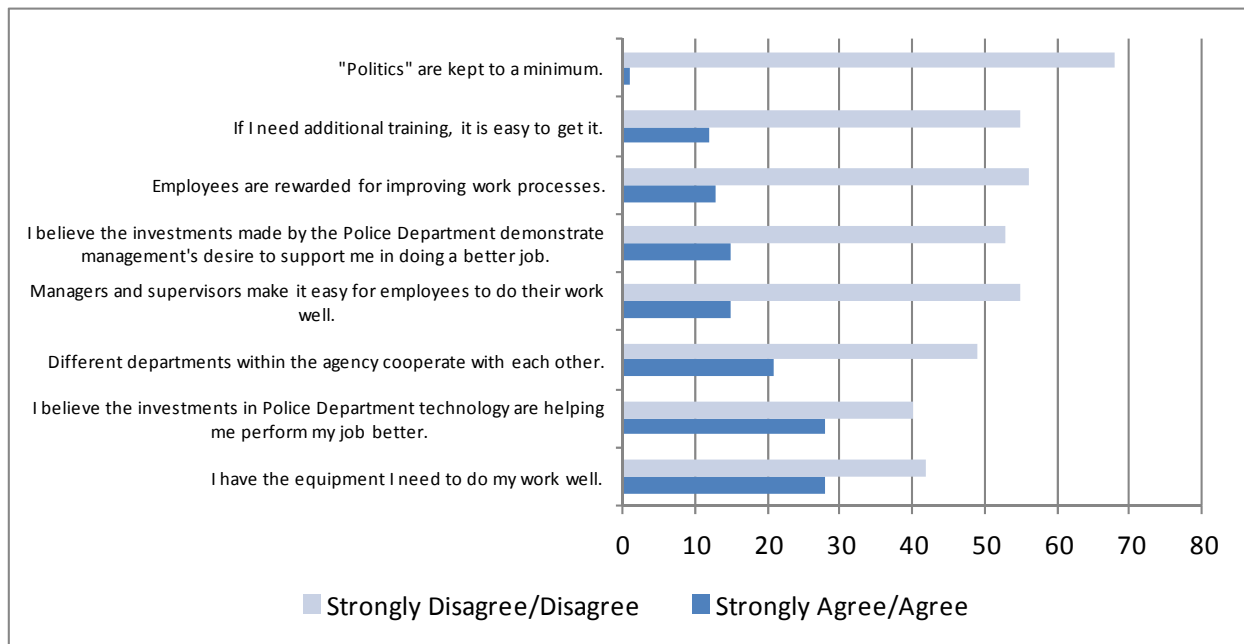
Figure 9. Productivity – Areas of Respondent Agreement



Respondents indicate strong agreement about job satisfaction. A majority of respondents (63%) find their jobs with the Covington Police Department interesting and exciting.

Areas of disagreement among respondents regarding questions about job productivity comprised eight of the 13 areas, and nearly 62% of respondents indicated disagreement with statements pertaining to overall job productivity within the Police Department.

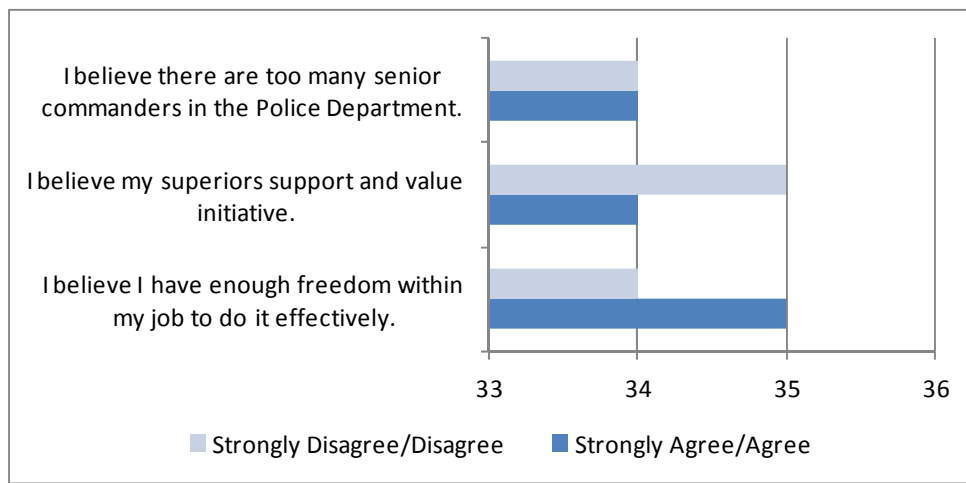
Figure 10. *Productivity – Areas of Disagreement*



Survey respondents most strongly disagree that politics within the Department is kept to a minimum and that training opportunities are easy to access. Focus group attendees further confirmed these two areas of strong disagreement. Although Figure 20 indicates a relatively low level of disagreement (40%) among respondents pertaining to investments in technology by the Police Department, namely the new CAD RMS system, focus group participants added insight. They characterized various elements of the new system as a productivity weakness due to difficulties in using the system and the length of time it takes to complete crime reports in CAD RMS.

Three of the productivity statements received neither agreement nor disagreement, specifically statements pertaining to the number of senior commanders in the Department, support from superiors and job freedom. Focus group comments indicate that there is likely more disagreement than agreement relative to issues of support from supervisors and commanders and job freedom. No clear sentiment was expressed during the focus groups about the number of senior commanders. Figure 21 illustrates the areas of neutral sentiment among survey respondents.

Figure 11. *Productivity – Neither Strong Agreement or Disagreement*

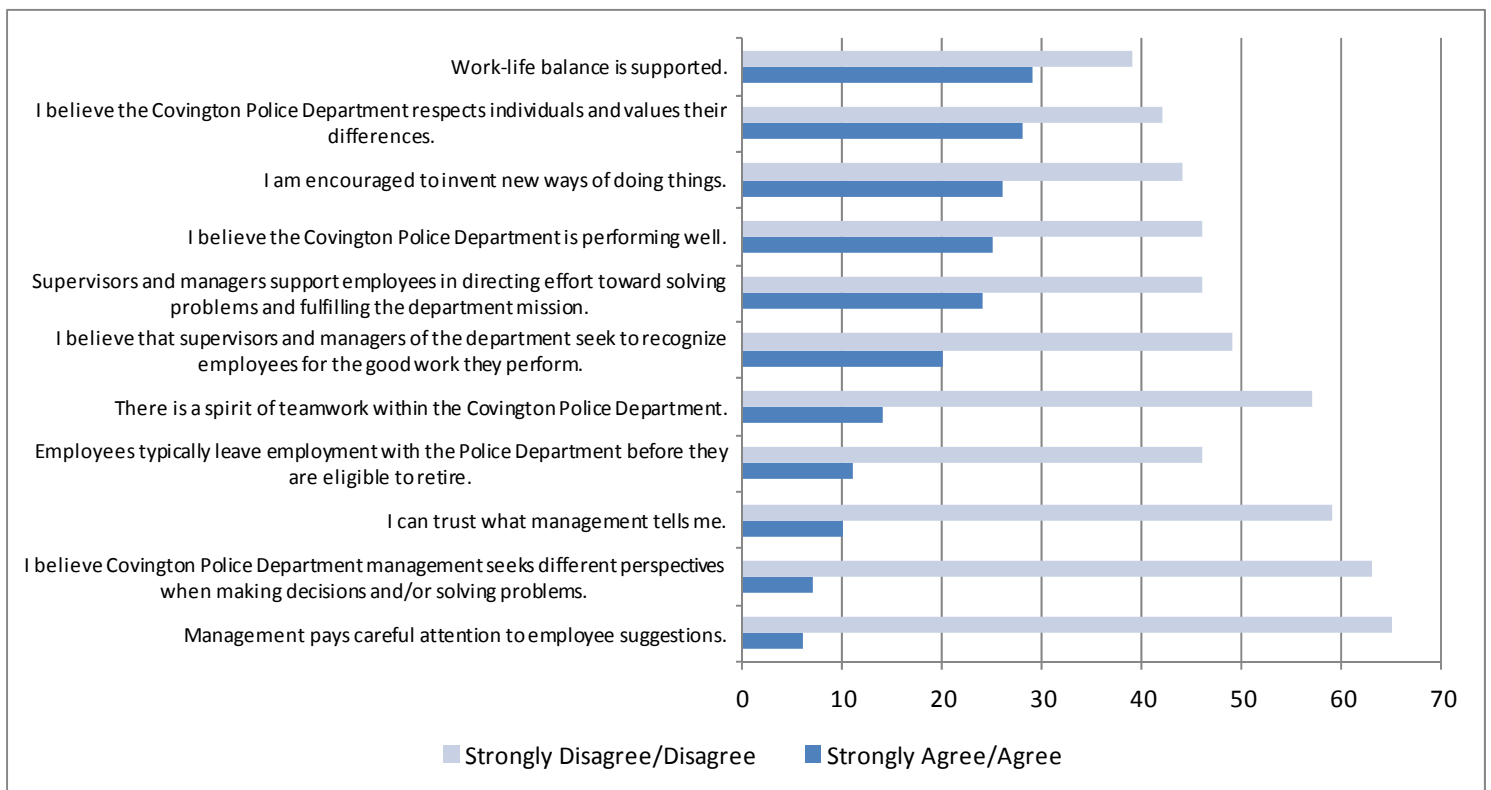


Culture

Twenty-five statements describing teamwork, pride, trust and other values of the Covington Police Department comprised this section of the survey. Overall, survey respondents expressed disagreement with 11 (44%) statements, agreement with 10 (40%) and neutral or no strong opinion with four (16%) of the statements pertaining to culture.

As shown in Figure 22, the strongest areas of disagreement among survey respondents in this category are associated with strong disagreement to statements that careful attention is paid to employee suggestions, input in decisions made by management, overall trust of management-level employees and teamwork within the Police Department.

Figure 12. Department Culture – Areas of Disagreement



Focus group participants indicated dissatisfaction and lack of input and involvement in the decisions made by command staff, and similarly noted instances leading to general levels of distrust between patrol officers and sergeants and civilians and sergeants. With regard to teamwork, focus group participants indicated that varying levels of teamwork exist within and between units. Focus group participants also stressed an unhealthy level of competition between two sergeants that has effectively eroded intra-unit teamwork.

Because survey respondents and focus group participants feel they lack support from supervisors to assist officers and employees in solving problems and in areas of employee recognition, morale is low. Low morale results in employees only doing their job, and nothing more; a lack of willingness to invent new ways of doing things and an overall feeling that things in the Department are not going well. Consequently, feelings of respect by command staff for individuals below the rank of sergeant are not high.

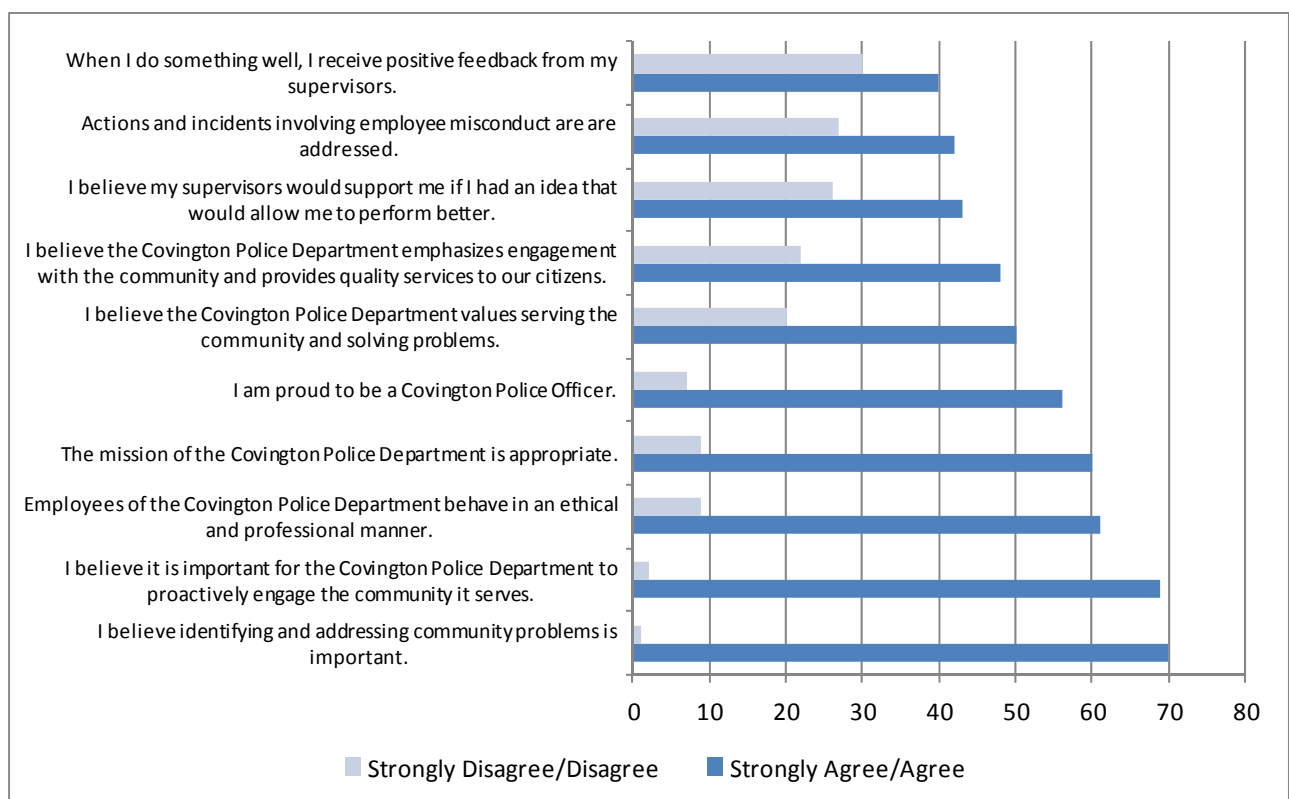
Focus group participants contradicted one statement that survey respondents indicated as an area of strong disagreement. While Figure 22 indicates that a majority of respondents (65%) disagree that “employees typically leave employment with the Police Department before they are eligible to retire,” focus group participants expressed the opposite sentiment. In fact, there was extensive conversation during the focus group sessions, with participants commenting

specifically about the employees now leaving the Department prior to or at 20 years of service, as well as employees leaving to accept lower paying jobs.

As shown in Figure 23, there were several areas of strong agreement among survey respondents for areas of Police Department culture concerning individual values and beliefs, such as the importance of addressing community problems, proactive community engagement, and ethical and professional behavior. Respondents also report strong agreement with the mission of serving the community and solving problems, pride in being a Covington police officer, and quality service to citizens of the City.

Respondents also indicated concurrence with other statements about culture in the form of supervisor support for ways to perform a job better, the handling of employee misconduct and kudos from supervisors when the employee does something well. Comments voiced during the focus groups were contradictory at varying levels. These areas of disparity point to subjects for further investigation to determine the prevailing environment regarding these cultural indicators.

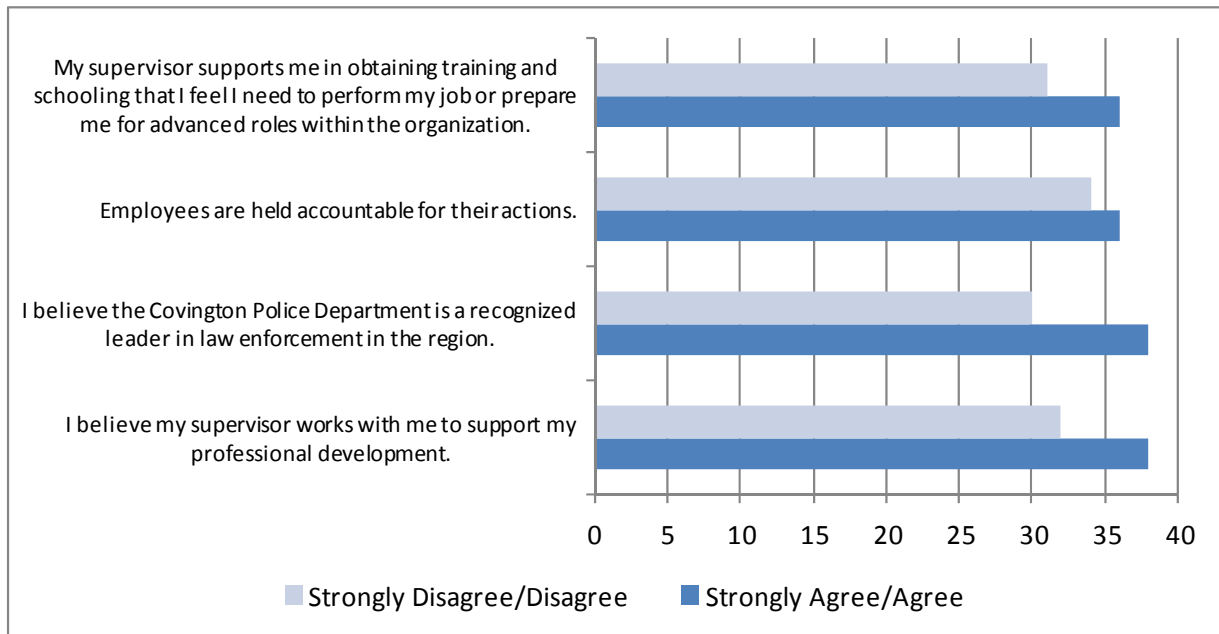
Figure 13. Department Culture – Areas of Agreement



Four statements received neither strong agreement nor disagreement, including supervisor support of employees to pursue professional development and training/schooling, and

employee accountability and a feeling that the Department is a recognized leader in law enforcement. Figure 24 includes these responses.

Figure 14. Department Culture – Neither Strong Agreement or Disagreement



Safety and Health

The safety and health area of the survey asked respondents to indicate levels of agreement/disagreement for 19 statements pertaining to working conditions, workload/amount of work, morale and job stability. Overall, there was agreement among respondents about 68% (13) of the statements addressing safety and health issues in the Police Department.

Survey respondents strongly agreed that the following conditions negatively affect employee morale and health: proposed health care changes, the financial position of the City, workforce reductions within the Department and the uncertainty of protracted labor negotiations.

Other areas of respondent agreement indicate that while employees feel empowered to correct unsafe conditions and act in a safe manner, there is a considerable concern about the lack of pay advances, job stability, the time needed to do a good job versus the allotted. Respondents agree they are overworked, however they also agree that the 10-day schedule has improved employee health and working conditions.

Focus group participants' comments related to safety and health were focused primarily on the lack of back-up on the streets, and safety concerns associated with improper equipment for the job, which directly affects safety and health.

Figure 25 includes statements receiving respondent agreement and strong agreement.

Figure 15. *Safety and Health – Areas of Agreement*

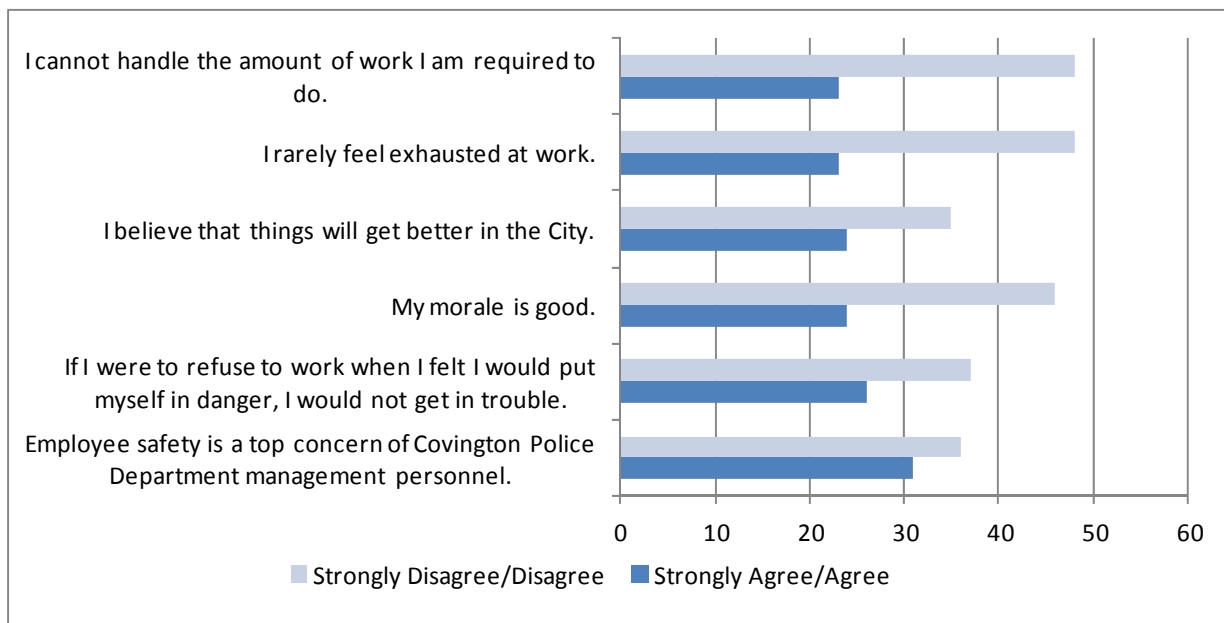


With respect to workload, respondents disagreed that they could not handle the current volume of work. Similarly, respondents do not report feeling exhausted at work. Relative to morale, respondents do not believe that things will get better, nor do they believe that morale is good.

Despite comments heard in focus groups about unsafe working conditions resulting from equipment and shift staffing concerns, survey respondents express the ability/authority to correct unsafe conditions, as well as the ability to refuse to work in situations that would put the officer/employee in danger.

Figure 26 shows the safety and health areas of respondent disagreement, and the one area where there was neither strong agreement nor disagreement – employee safety as a top concern among management.

Figure 16. *Safety and Health – Areas of Disagreement*



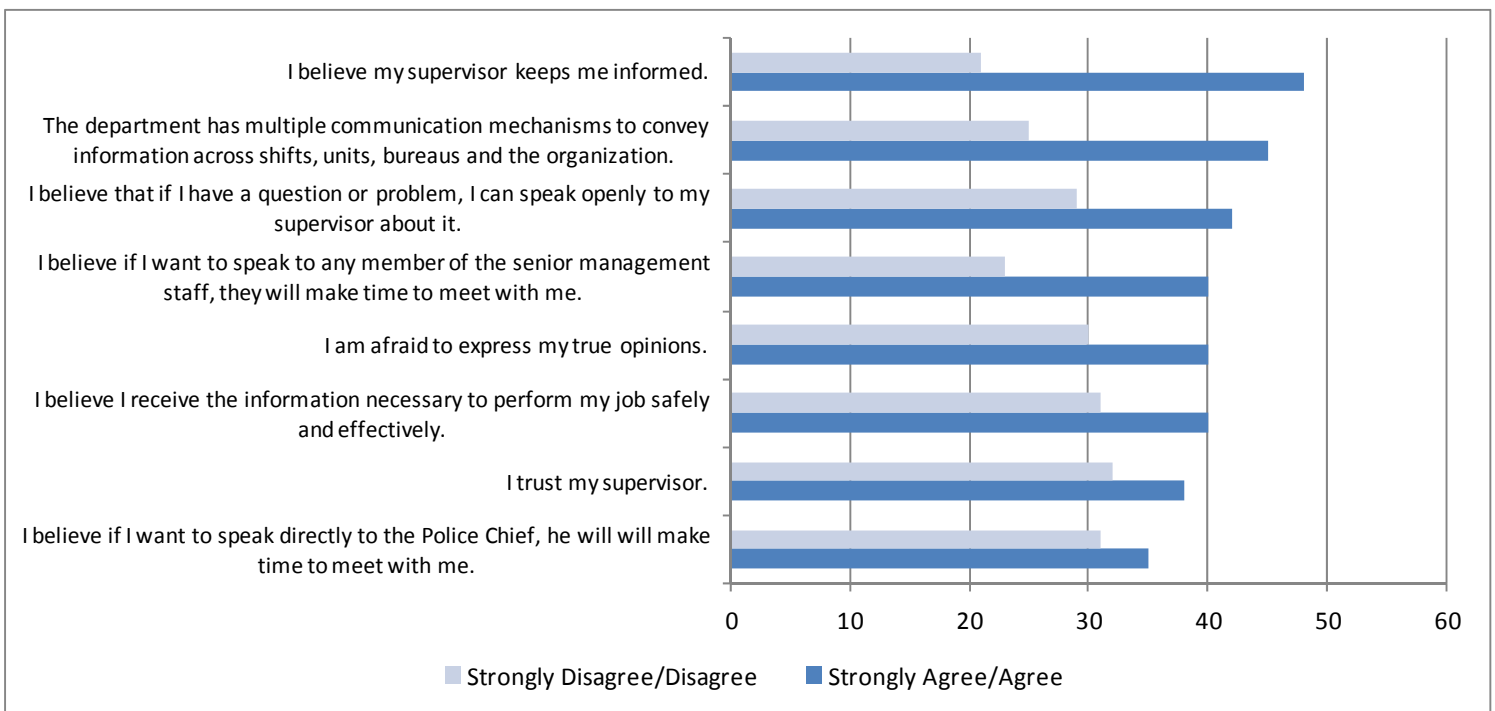
Communication

Lastly, the employee survey included 12 statements pertaining to communication, specifically, methods of information sharing and dissemination, the supervisor's role in informing patrol officers and civilian employees and the ability of employees to communicate with command staff.

As shown in Figure 27, survey respondents strongly agree that supervisors do a good job of keeping officers and civilian staff informed, and that multiple forms of communication exist within the department. With regard to supervisor access for the purpose of communication and the ability to speak openly, respondents expressed strong agreement. Survey respondents express agreement with statements about receiving information necessary for safe job performance, trust for the supervisor and access to the Chief.

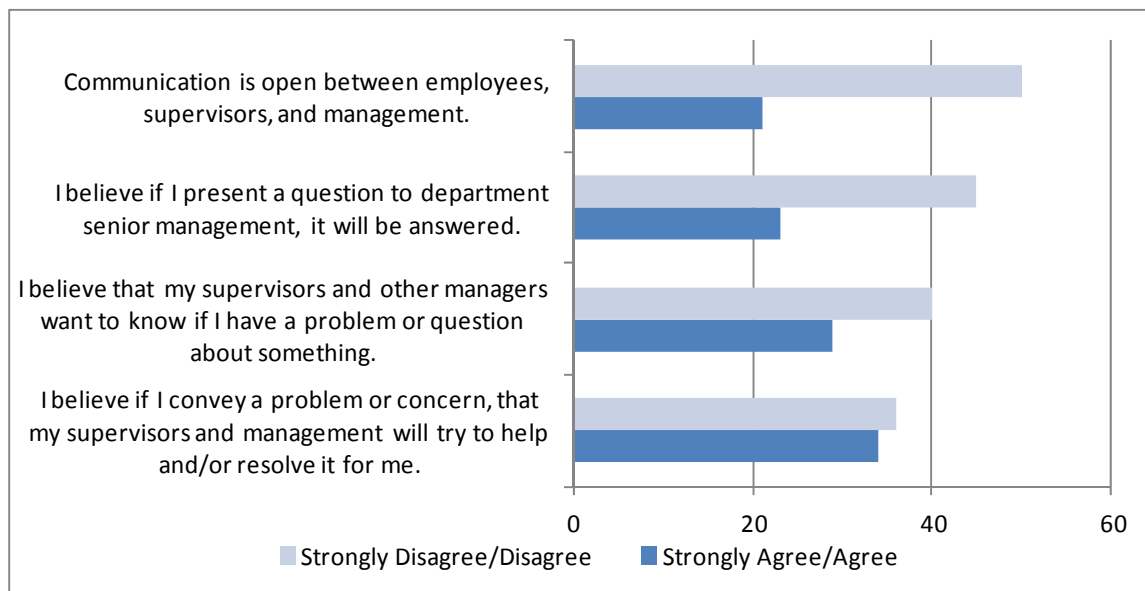
Respondents indicated strong agreement about the ability to speak openly to their supervisor, and being afraid to express truthful opinions. Focus groups discussions indicate the possibility of repercussion or retaliation from supervisors or command staff for statements made by patrol officers and civilians.

Figure 17. Communication – Areas of Agreement



Communication areas of disagreement, Figure 28, indicate that a feeling exists among respondents that the lines of communication within the Department, between the leadership and the rank and file, is not open. Further, respondents indicate that questions presented to senior management will not be answered, nor do respondents feel that Department command staff and other managers want to know of Police employee problems or questions.

Figure 18. Communication – Areas of Disagreement



Comments and input obtained during the focus groups support the opinion that questions and issues of concern by patrol officers and civilian staff to supervisors are not addressed/resolved in a timely manner, if at all. There was a general feeling among focus group attendees that efforts to keep employees apprised of new events and useful information had diminished over the past four to five years. Focus group attendees described the current level of communication in Police Department as uneven, hit or miss and after the fact. As expressed by focus group attendees, the poor state of communication occurs in the Police Department and extends to information issued by City Hall to Department personnel.

The last statement in Figure 12 indicates respondent ambivalence concerning the degree of willingness on the part of supervisors and management to help employees resolve problems.

Attachment C – Employee Survey Summary

An element of this review of the Fire Department included a survey of fire department employees. A confidential employee survey was conducted from March 23 to April 13. All 119 members of the Fire Department were given the opportunity to share their thoughts via the online survey and 40 employees responded.

The survey covered a range of topic areas including staffing levels, employee safety, training, technology, support services and customer satisfaction. Respondents were given the opportunity to agree or disagree with several statements in each subject area. It is important to remember that this is an opinion survey.

Nearly half of the respondents have been with the Covington Fire Department for less than 10 years with 10% of the respondents having been a member of the department for over 20 years. Table 14 below details the position breakdown of the respondents.

Table 26. *Respondents by Position*

Position	Percentage of Respondents
Firefighter	33.3%
Engineer	23.1%
Captain	17.9%
Battalion or Division Chief	10.3%
Any other Chief level title	2.6%
Civilian staff member	2.6%
Civilian volunteer	2.6%
Other	12.8%

As the table shows, one third of the respondents are firefighters, nearly a quarter are engineers and almost one-fifth are the captain level. All but three of the respondents were sworn employees.

Staffing

Figure 4 below shows those statements about staffing to which respondents strongly agreed or agreed.

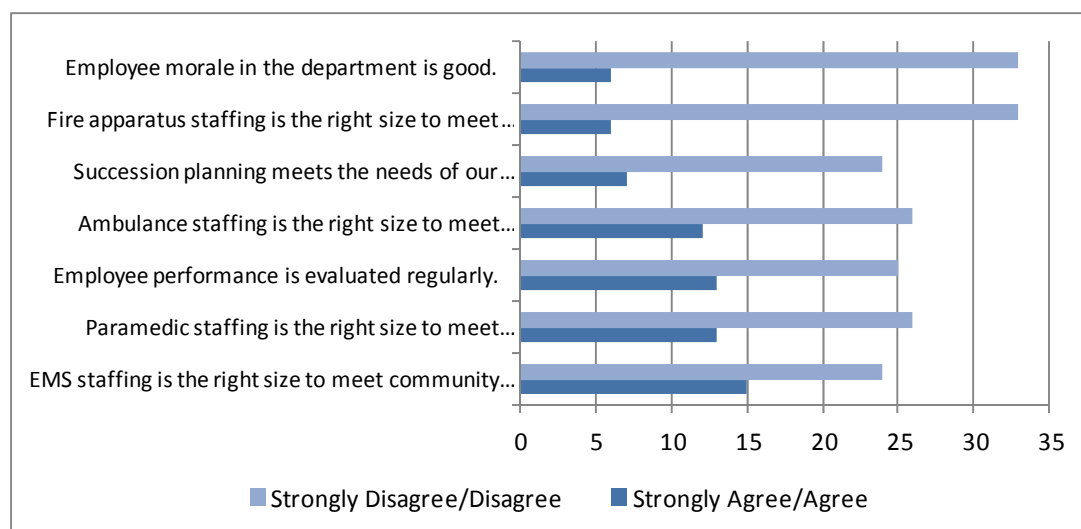
Figure 19. Agreement about Staffing Statements



It is clear that respondents believe their work is valued by their colleagues with 35 of the 40 respondents either strongly agreeing or agreeing with that statement. Respondents also feel valued by their supervisor and most importantly by the customer. Respondents also believe that on-scene staffing, fire prevention staffing and supervisory staffing are all adequate to meet the needs of the community.

Figure 5 shows those statements about staffing to which respondents did not agree.

Figure 20. Disagreement with Staffing Statements

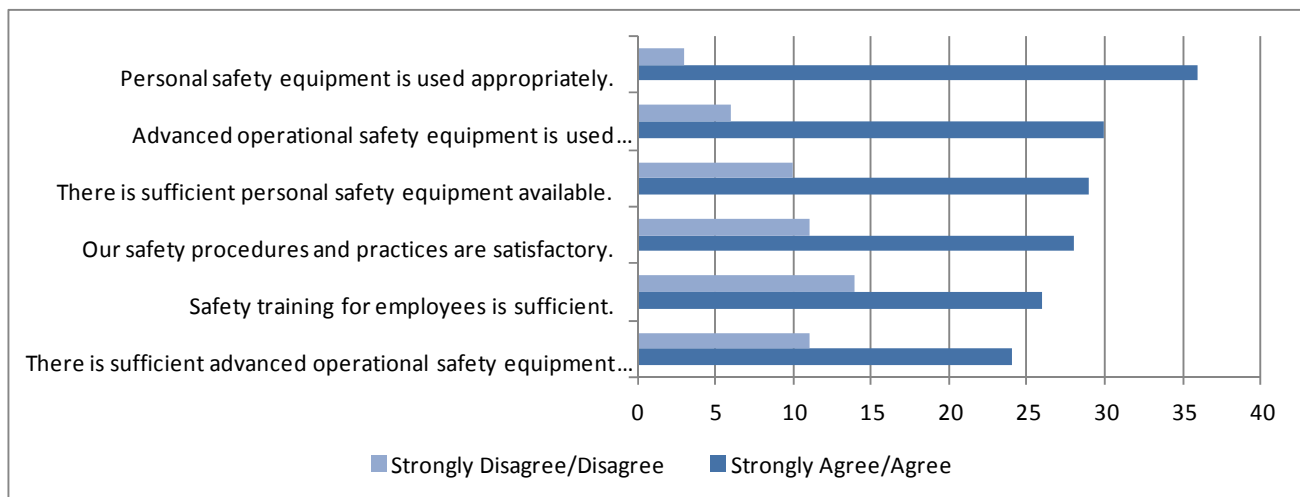


Respondents did not think apparatus staffing for either fire or EMS is adequate to meet community needs. They also did not think succession planning has been developed enough to meet the needs of the department. Only 6 of 40 respondents indicated morale is good.

Employee Safety

As Figure 6 shows, respondents strongly agreed or agreed with every statement regarding employee safety.

Figure 21. Agreement with Statements about Safety



Respondents believe safety practices are sufficient and that safety equipment is used appropriately. While 26 respondents agree that safety training is adequate, 14 respondents indicated training could be better.

Employee Skills and Training

Figure 7 shows those statements about skills and training with which respondents agree. They overwhelmingly agree that they have the technical skill to perform on the job functions. They also agree that training requirements and frequency of training is sufficient. While a majority of respondents, 20, agree that the quality of training is sufficient, nearly as many (18) do not think the quality of training is sufficient.

Figure 22. Agreement with Statements about Employee Skills and Training

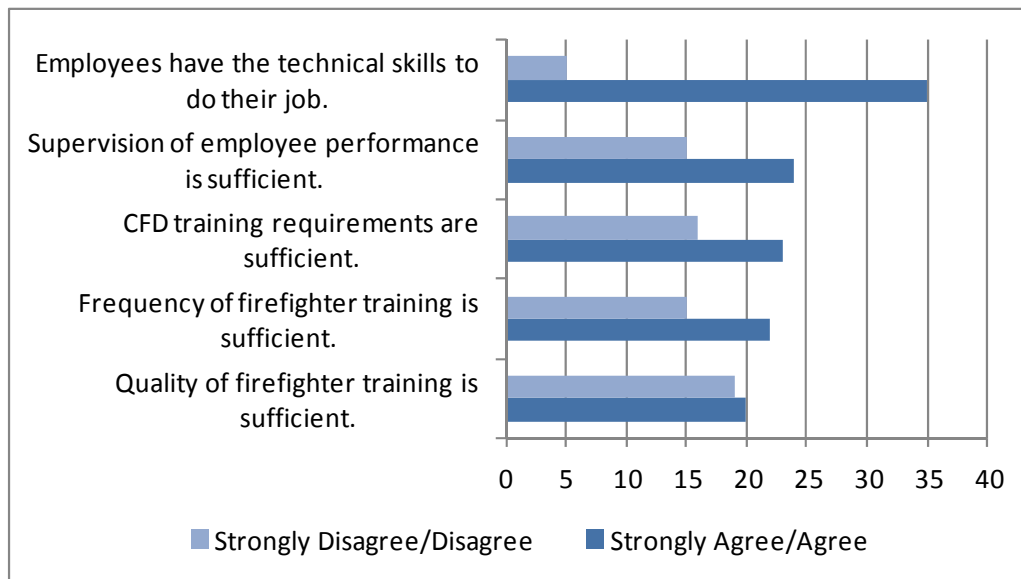
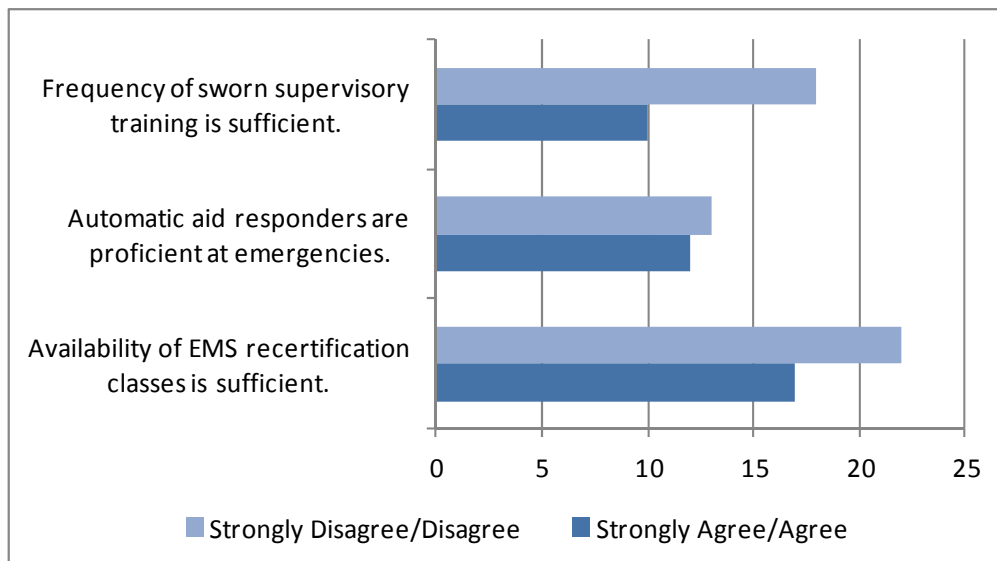


Figure 8 shows the statements about skills and training with which majority of respondents did not agree.

Figure 23. Disagreement with Statements about Employee Skills and Training

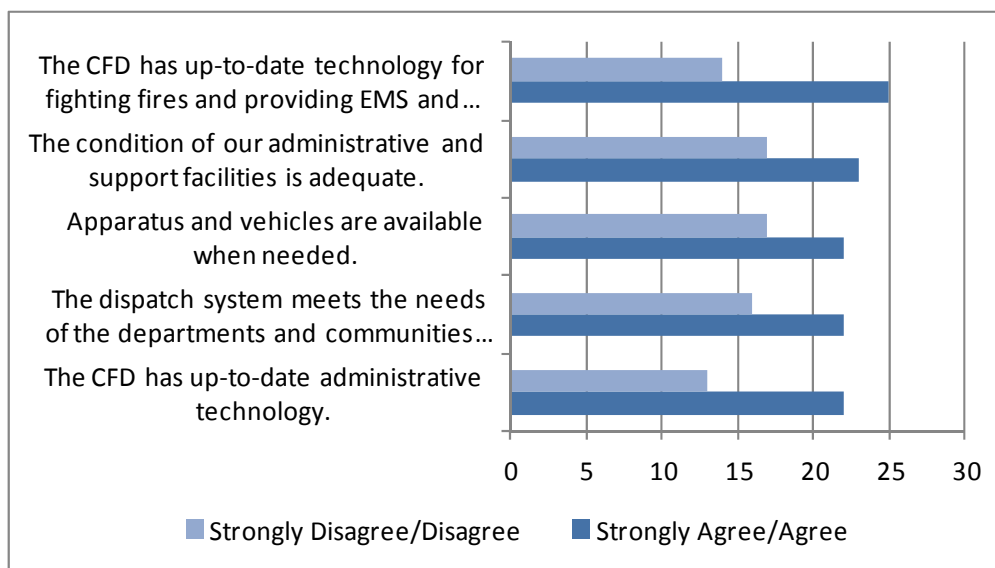


Respondents believe supervisory training is not sufficient, nor do they think automatic aid responders are proficient at emergencies. Respondents would also like to see the availability of EMS recertification classes increase.

Technology, Facilities and Equipment

Respondents were asked to agree or disagree with several statements regarding technology, facilities and equipment. Figure 9 shows the statements with which a majority of respondents agreed.

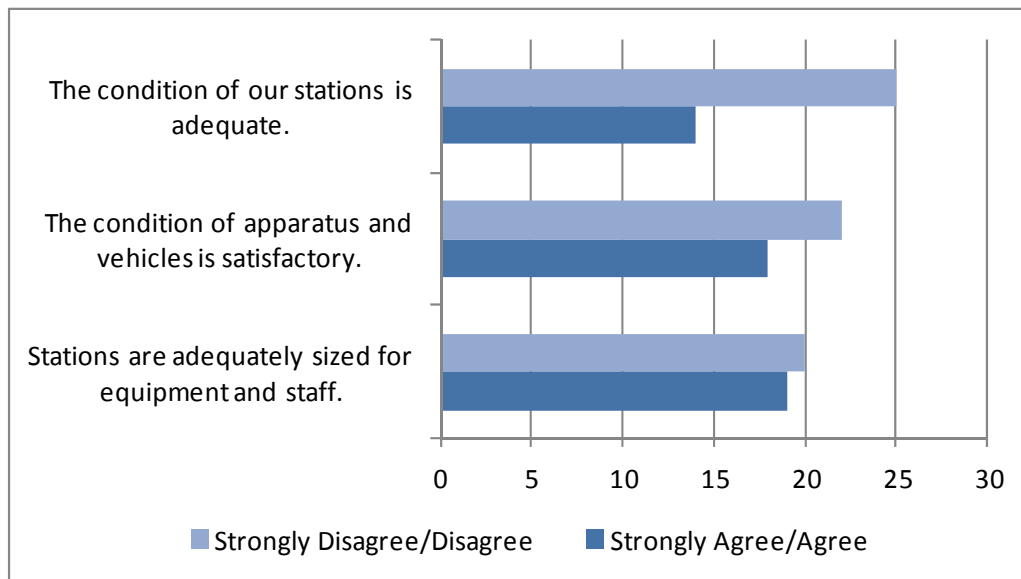
Figure 24. Agreement with Statements about Technology, Facilities and Equipment



Respondents generally agree that technology within the department is sufficient for its needs and that apparatus are available when needed. They also feel that the administrative/support facility is adequate.

However, as Figure 10 shows, respondents do not feel the condition or size of stations is adequate, nor do they believe the condition of their apparatus is satisfactory.

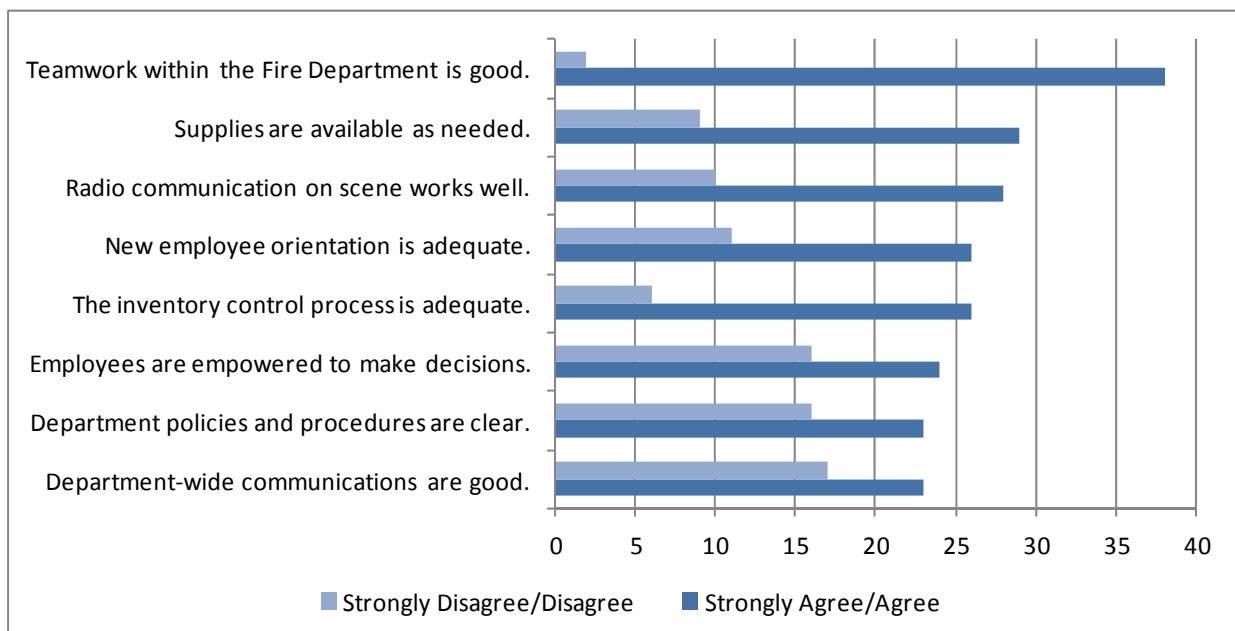
Figure 25. Disagreement with Statements About Technology, Facilities and Equipment



Organization, Support Services and Technical Response

These statements asked respondents about teamwork, communication and organization. Figure 11 shows those statements with which the majority of respondents agreed.

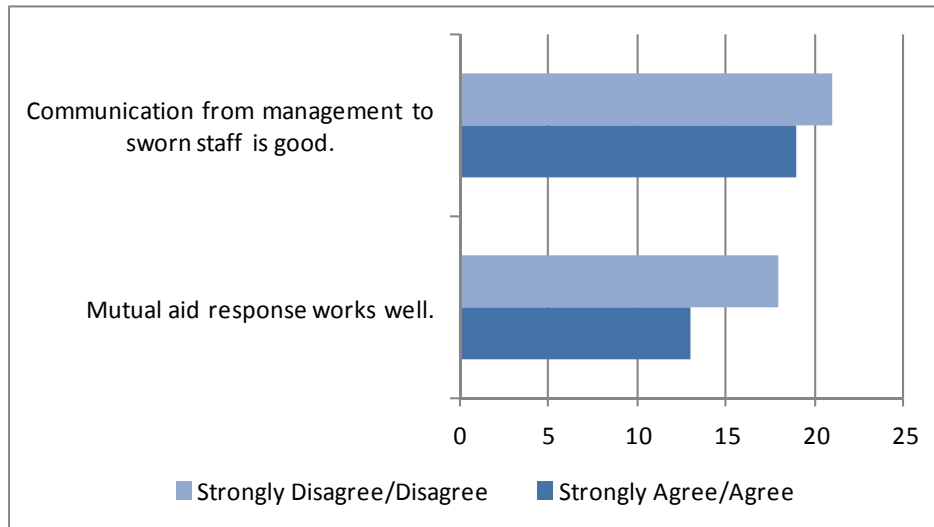
Figure 26. Agreement with Statements about Organization, Support Services and Technical Response



Respondents overwhelmingly agree that teamwork within the department is good. They also believe that department-wide communication is good and that supplies are available when needed.

However, as Figure 12 shows, respondents think that communication from supervisory staff could be better. And as previously reported, they do not think mutual aid response works well.

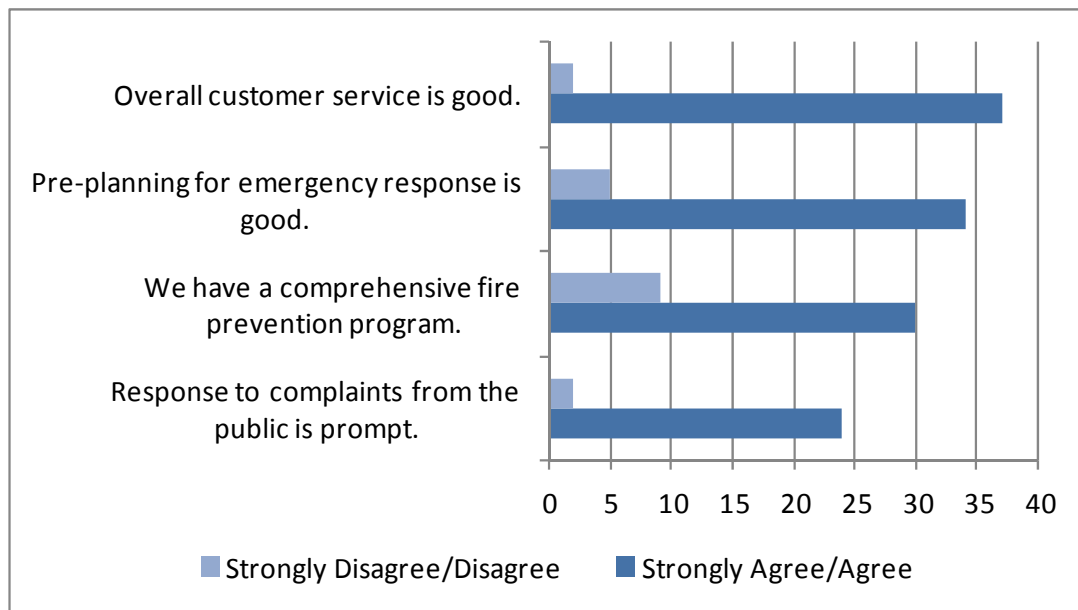
Figure 27. Disagreement with Statements about Organization, Support Services and Technical Response



Customer Service

Respondents were asked about the department's customer service. Figure 13 shows that they agreed with all the statements presented, overwhelmingly indicating that their customer service is good.

Figure 28. Agreement with Statements about Customer Service



Improvements

The respondents were asked a series of open-ended questions to gauge their thoughts on what the department does well and how it could improve. A majority of respondents noted that the department has great teamwork and provides the customers with a high level of service. However, the issue of staffing levels was repeated numerous times regarding browning out pumpers and needing to cross-staff apparatus (ambulance and engine).

The biggest issue from the open-ended responses is that of morale. Respondents indicated there is low morale due to budget and staffing cuts, contract issues, and most importantly, the way they feel they are treated by the elected officials and City administration.